

PRIVACY NOTICE

Executive summary

- This notice applies in relation to visitors to the website operated by The Sloane Street Surgery Limited (“Sloane Street Surgery”, “we”, “us” and “our”) and to any suppliers or other third parties who provide their personal data to Sloane Street Surgery. Sloane Street Surgery is the controller of your personal data that it holds relating to you.
- We have a separate notice that applies in relation to our patients’ personal data.
- As the custodian of your personal data, Sloane Street Surgery will only use that personal data in accordance with applicable data protection laws. This Privacy Notice provides you with an overview of how Sloane Street Surgery will handle your personal data and how it complies with the law.
- We will use your personal data to respond to enquiries received through the website, and to manage our relationship with you if you are a supplier or other third party (other than if you are a patient).
- In addition, you have rights as a data subject. You can, for instance, seek access to the personal data we hold about you, request rectification of any personal data which is inaccurate or deletion of personal data which is no longer required (subject to certain exceptions). This Privacy Notice also sets out your rights in respect of your personal data, and how to exercise them.
- For ease of reference, this Notice is broken into separate sections below with headings which will help you to navigate through the document.

About Us

- In this Privacy Notice we will use “we” or “us” or “our” to refer to Sloane Street Surgery.
- If you have any queries, comments, or concerns in respect of the way we have used or potentially will use your personal data then you should contact us directly and we would be happy to discuss further. Please contact our data protection officer directly:

Telephone: 020 7245 9333

Email: tdean@sloanestreesurgery.co.uk

Post: Data Protection Officer, Sloane Street Surgery, Fordie House, 82 Sloane Street, London SW1X 9PA

Your Personal Data

- We promise to protect your privacy in compliance with applicable data protection laws and relevant guidance when handling your personal data.
- We will handle your personal data in accordance with applicable law and this Privacy Notice. Where applicable, your personal data will also be managed in accordance with relevant professional standards including guidance from the GMC and the BMA.

What personal data do we collect and use?

Website enquiries

- We currently collect and process the following types of personal data:
 - name, email address and telephone number and any information you choose to provide as part of your enquiry.
 - Information concerning your interest in our services. Although website enquiries will typically relate to our services, they may also include a small amount of information relating to your health or any medical condition).
 - To the extent you provide, through our general enquiries / contact form (as opposed to our patient registration form), any health-related personal data or any other sensitive personal data that falls within defined special categories, our patient privacy notice will apply instead of this notice.

Suppliers and other third parties

- We currently collect and process the following types of personal data:
 - Name, contact details (address, email address and telephone number), nature and purpose of the relationship with Sloan Street Surgery.

Prospective patients

- If you choose to register through the website should, instead of this notice, please refer to our patient privacy notice.
- As soon as you register to become a patient, that notice will apply in relation to our handling of your personal data instead of this notice.

How do we collect your personal data?

- Most of the personal data we process is provided to us directly by you when you complete an enquiry form via the “contact” pages of our website. You may also submit an enquiry to us by email.
- We may also receive personal data from the following sources in the following scenarios.
 - From you or a recruitment agency as part of any recruitment process for vacant positions at Sloane Street Surgery
 - From you or from your employer if you or your employer is a supplier (or prospective supplier) to Sloane Street Surgery

Uses of your personal data

Principal uses of your personal data

- We will use your personal data to respond to your enquiry regarding our services or, in the case of suppliers and other third parties, to manage our relationship with you, including in relation to our contractual or other legal rights and obligations (where applicable).

Other uses of your personal data

We may also use your personal data for the following purposes.

- To communicate with you about our services, including services you have requested from us and other information which we feel may interest you or be relevant to you.
- To notify you about changes to our services.
- To administer our relationship with you, including taking steps to set you up as a patient of Sloane Street Surgery.
- To comply with applicable laws and regulations and requests from statutory agencies / authorities including for such purposes as health and safety or the detection and prevention of crime.
- To analyse and understand how people use our website and services

The legal basis on which we rely for processing your personal data

General personal data

We may process your personal data on the basis of several different legal bases. Each time we use your data we must have legal basis for doing so. The basis will depend on the purpose of the proposed use of your data.

Generally, we will rely on the following legal justifications or grounds:

- Taking steps at your request so that you can enter into a contract with us or receive medical services from us.
- We have an appropriate business need to process your personal data and such business need is not overridden by your interests or fundamental rights and freedoms. We will rely on activities such as quality assurance, maintaining our business records, monitoring outcomes and responding to any enquiries or complaints.
- We have a legal or regulatory obligation to use such personal data.
- You have provided your consent to our use of your personal data.

Note that failure to provide your personal data further to a contractual requirement with us may mean that we are unable to set you up as a patient.

Health or medical data

When the personal data that we process is health or medical related, it is classed as a special category of personal data. In that case we must have a specific additional legal basis to use it as proposed. These legal bases are set out in our patient privacy notice.

Appropriate business needs

One legal basis for processing personal data is where we do so in pursuit of legitimate interests and those interests are not overridden by your privacy rights. Where we refer to use for any appropriate business needs we are relying on this legal basis.

How will we communicate with you?

We may communicate with you in a range of ways, including by telephone, messaging services, email, and post. If we contact you using the telephone number(s) which you have provided by landline or mobile and you are not available which results in the call being directed to voicemail and/or an answering service, we may leave a voice message on your voicemail or answering service as appropriate, which may include sufficient basic details to enable you to identify who the call is from, very limited details as to the reason for the call and how to call us back.

Where we communicate with you by email, our communications will be unencrypted unless we expressly state otherwise in this notice.

Surveys

We may contact you to request feedback regarding your experience of Sloane Street Surgery. This will largely be sent by messaging service, or email or post. This is not a form of marketing and we will not try to sell you any further products or services. It is solely to gather information about your experience of Sloane Street Surgery. Participation in these is purely voluntary. You may decide not to give a review.

How long do we keep your personal data?

We will only keep your personal data for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with our legal and regulatory obligations.

Generally, we will delete the personal data received via our website within [12] months.

If you are a supplier to Sloane Street Surgery we will retain your personal data for the duration of the relationship with the supplier and for a reasonable period after that relationship ends. That will generally be not less than 6 years.

However, if you become a patient of Sloane Street Surgery we will retain your personal data in accordance with the terms of our patient privacy notice.

If you become an employee of Sloane Street Surgery we will retain your personal data in accordance with the terms of our employee privacy notice.

If you would like further information regarding your personal data please contact us by using the details provided.

The Data Protection Officer
Sloane Street Surgery
Fordie House
82 Sloane Street London
SW1X 9PA

Or by telephone 020 7245 9333 and ask to speak to the Data Protection Officer

Or by email to tdean@sloanestreesurgery.co.uk.

Sloane Street Surgery is registered with the ICO: ZB521649

International Data transfers

We do not anticipate that we will transfer of your personal data outside of the UK or the EEA. If we do need to transfer it outside the UK or the EEA, we will only do so where the country to which the personal data would be transferred ensures an adequate level of protection for your rights and freedoms or we have provided appropriate safeguards for your personal data.

Your rights

Under Data Protection Law you have certain rights in relation to the personal data that we hold about you and how it is used. Your rights include:

- **Access** - you can ask for a copy of your personal data.
- **Rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data.
- **Erase** - you can ask us to erase your personal data in certain circumstances.
- **Restriction of processing** - you can ask us to restrict the processing of your personal data in certain circumstances.
- **Object to processing** - you can object to the processing of your personal data in certain circumstances. This applies, in particular, where the lawful basis on which we process your personal data is our legitimate interests.
- **Data portability** - you can ask that we transfer your personal data to another organisation, or to you, in certain circumstances.
- **Make a complaint** - you can complain to a supervisory authority (in the UK, this is the ICO - see below) about our processing of your personal data.
- **Withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent at any time. You can do this by emailing us at [insert].

You may exercise these rights at any time by contacting us using the details provided above.

- There will not usually be a charge for handling a request to exercise your rights
- If we cannot comply with your request to exercise your rights, we will tell you why

These rights are subject to certain limitations and exceptions. You can learn more about these rights by reading the [ICO guidance on your rights](#).

The right to complain to the Information Commissioner's Office

You can complain to the Information Commissioner's Office if you are unhappy with the way that we have dealt with a request from you to exercise any of these rights or if you think we have not complied with our legal obligations.

More information is available and can be found on the Information Commissioner's Office website: <https://ico.org.uk/>.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time to ensure that it remains accurate, and the most up to date version can always be found on our website. In the event that there

are any material changes to the manner in which your personal data is to be used then we will provide you with an updated copy of this Privacy Notice.

This notice has been issued March 2024

Last Review:	March 2024
Next Review:	March 2025