

Privacy Policy

This privacy policy applies to Horizon Rehabilitation Ltd's website at www.horizonrehabilitation.co.uk (the "Website") and the services of Horizon Rehabilitation Ltd, its Employees, Associates and Service Providers ("We", "Us" and "Horizon Rehabilitation"). Horizon Physiotherapy is a trading name of Horizon Rehabilitation Limited, Company No: 12353876, referred to hereafter as Horizon Rehabilitation. Horizon Rehabilitation take your privacy seriously and aim to be as clear as possible about how and why we use information about you so that you can be confident your privacy is protected. This policy covers the collection, processing and other use of personal data under the Data Protection Act 1998 ("DPA") and the General Data Protection Regulations ("GDPR"). By using the Website and the services of Horizon Rehabilitation, you consent to this policy.

For the purposes of the website and communication between Horizon Rehabilitation, its employees, Service Providers and Associates, Horizon Rehabilitation is the data controller. For the purpose of GDPR with regards to provision of services, Horizon Rehabilitation and its Associate Practitioners are joint data controllers. Our Associates are all affiliated to Horizon Rehabilitation but act independently as Chartered Physiotherapists or CSP Associate Members, following the CSP guidance for management of your records (<https://www.csp.org.uk/publications/record-keeping-guidance#storage> PD061 version 3, November 2016).

Any enquiry regarding the collection or processing of your data should be addressed to:

Karen Blagojevic, Clinical Director, Horizon Rehabilitation Ltd, 1 Springwood, Chapel Hill, Speen, HP27 0SN. Horizon Rehabilitation Ltd is registered with the Information Commissioner's Office ("ICO") for this purpose. Certification number: ZA652507

GDPR has identified eight specific rights for individuals we must align to. These give you the right to:

- be informed about how your personal data will be used
- receive a copy of any personal data we hold on you
- have your personal data rectified if it is inaccurate or incomplete
- have your personal data erased without unnecessary delay
- 'block' or suppress the processing of your personal data
- obtain your personal data, if held electronically, in a format that will enable them to move, copy or transfer this information from one IT system to another
- object to certain types of processing, such as for direct marketing purposes
- not be subject to an automated decision-making process where those decisions have 'a legal effect' or 'a similar, significant effect' on you.

These rights are not absolute and where we have a legal requirement to retain or share information this may take precedence.

The Data Protection Act 2018 (DPA 2018), which currently supplements and tailors the GDPR within the UK, will continue to apply once we leave the EU. The provisions of the GDPR will be incorporated directly into UK law from the end of the transition period, to sit alongside the DPA 2018.

Please note, if you were a client prior to 31st December 2020 previous versions of this policy may apply. Client's receiving input from September 2020 have had their data inputted into Jane. You can activate your personal account in order to manage your data preferences.

This privacy policy informs you how your personal data will be used.

Systems and processes we use to securely manage your information

Horizon Rehabilitation use a Clinic Management Platform called Jane.App (“Jane”). Jane stores information that is required for legitimate reasons related to the provision of our services. You will be sent an invitation to create your own Jane Account. Please take a moment to check that all the information on your account is correct. You can use your account to view your appointments, pay your fees and select your communication preferences. For detailed information on how data is collected, stored and handled please refer to Jane’s Privacy Policy <https://jane.app/legal/privacy-policy>

Jane stores Patient Data in its secure UK data center and acts as a data processor. It makes the data available only to Horizon Rehabilitation and their users through the clinic management platform. Jane otherwise has no control over Patient Data. Jane will only access Patient Data on the instructions of Horizon Rehabilitation or its practitioners or staff or, in rare cases, where needed in order to prevent or address technical problems or if required by law or court order.

Jane integrates with MailChimp so that we can securely email you more general information, newsletters and updates about our services. Mailchimp has its own GDPR compliance policy: <https://eepurl.com/dyiknH>. Each email you are sent includes the option to remove yourself from this database. You can also manage your preferences through your Jane account.

Horizon Rehabilitation use the services of Balmer Ltd for our Front Desk functions and administration. Balmer Ltd act as a data processor and are bound by these terms by a formal agreement. We use Microsoft Office 365 as our office management platform which uses encrypted processes.

Horizon Rehabilitation use the services of Rehab Guru to help with your personal rehabilitation programme. Rehab Guru is a software platform which requires your email address to enable its full functionality. Rehab Guru has its own policies regarding the collection, use, and disclosure of personal data: <https://www.rehabguru.com/privacy-policy>

Information we collect

We will collect personal data on this Website only if it is directly provided to us by you, the user via the Contact form e.g. your e-mail address, name, home or work address and telephone number, and therefore has been provided by you with your consent. Normally you will only provide such details if you wish us to make contact with you or to sign up for our free e-newsletter or other resources. When you are booked in for any of our services, your data is inputted into Jane. You will also be invited to provide more detailed information via one of our intake forms.

We use analytical and statistical tools on our website that monitor details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data (but this data will not identify you personally). We analyse visitor traffic via Google Analytics, the cookies in use are: `_ga`, `_gat` & `_gid`. Google’s policy can be found here: <https://policies.google.com/privacy>

Your payment information (e.g. bank card details) is not stored by us and we do not have any access to this information. That information is processed securely and privately by the third party payment processors that we use. Card payments are processed by iZettle (Card Machine) or Stripe (online via Jane). iZettle is GDPR compliant. Please see <https://www.izettle.com/gb/privacy-policy>
Jane never stores a client’s plain credit or debit card information directly on Jane’s servers. When you enter a bank card in Jane, Jane instantly transfers that data to Stripe through encrypted transfer. Stripe is a PCI-compliant payment processing partner that stores information for Jane. The default behaviour of these

partners is to store the credit card information so that refunds can be processed. You can access your account at any time to change or remove your payment information.

We use a cloud accountancy system (Xero) for invoicing and financial administration which uses and stores the minimum amount of personal information necessary for these purposes. They have stated they are GDPR compliant <https://www.xero.com/uk/about/privacy/>. Our accountancy firm have access to this account and act as a data processor under these terms.

We may occasionally request more details from you in order to process a refund.

We collect clinical and health information as part of our professional and legal requirements to keep records regarding the services we provide. These are collected in paper and digital formats and may be exempt from requests for data access, correction or deletion through GDPR. Any queries or concerns regarding your clinical information should be made in writing.

How we will use your personal data

The personal information we collect and store is used primarily to provide our services to you and keep our clinical records, therefore meeting our professional, legal and contractual commitments. We may also use your data to:

- Know who you are so that we can communicate with you. The legal basis for this is a legitimate interest.
- Deliver goods and services to you. The legal basis for this is the contract with you.
- Process your payment for the goods and services via card payments and invoicing. The legal basis for this is the contract with you.
- Verify your identity so that we can be sure we are dealing with the right person. The legal basis for this is a legitimate interest.
- Compile risk assessments and record/share your address to protect our lone workers.
- Enhance your experience of our website. The legal basis for this is a legitimate interest.
- Provide you with a useful and relevant website. The legal basis for this is a legitimate interest.
- Notify you of changes to our website, such as changes to products or services that may affect the service we provide to you. The legal basis for this is a legitimate interest.
- To provide you with an e-newsletter or information about goods and services similar to those that were the subject of a previous sale to you that may be of interest to you. The legal basis for this is a legitimate interest.
- To form a client database that may be transferred to another data controller as part of the sale or restructure of the company.

Checking and rectifying your personal information

If you have supplied your personal information via the website contact form or other format then we will assume that the information you have supplied is accurate. Where we have compiled a report or other information you have consented we share, we will ask you to check the personal data within this for accuracy. Clinical information and opinions are not open to such review.

How long will we keep your data?

Where you have made an enquiry regarding our services, we will retain this information on Jane for up to 1 year. This is to ensure we provide you with the best possible service should things change and you contact us again. If you do not become a client within this time, we will safely destroy your information. If you become a client, your data is inputted into Jane and will form part of your clinical record.

Where we have provided professional or clinical services to you, we follow the Department of Health guidance to retain clinical records for 8 years after our last contact with you. Our clinical records are paper-based as well as digital and will be securely destroyed within a reasonably practicable timeframe from this point. We follow the

CSP guidance on data handling and storage <https://www.csp.org.uk/publications/record-keeping-guidance#storage> PD061 version 3, November 2016.

How else we store your data:

- **Mailchimp**

We use Mailchimp as our mailing list software to protect your identity when sending out general information. Mailchimp has its own GDPR compliance policy: <https://eepurl.com/dyiknH>. Each email you are sent includes the option to remove yourself from this database. You can also manage your preferences through your Jane account.

- **Paper Records**

Clinical records are made on paper and stored by your Clinician in a locked filing cabinet at their home address. Jane is also used to store clinical records and health information. If you are receiving domiciliary services, these records will be carried to and from your appointment by the Clinician in a manner compliant with the relevant professional body for that clinician and the Health and Care Professions Council (HCPC). Once no longer receiving services, all records are held securely at the office address for the time period required.

- **Email**

Communication by email will minimise use of your personal data. In the event that personal data is to be used, we will seek to verify your email address. We will also password protect documents that contain personal data. Emails are stored indefinitely by the email provider (Microsoft Outlook-Office 365). Email correspondence will be kept on this platform during the time that we are providing you with services. After this, if they are pertinent to your clinical record, they will be stored with these and the master copy deleted from the email platform. All others will be deleted as soon as reasonably practicable.

- **Images**

Images for which we have your consent to obtain and use will be stored on an external hard drive, locked securely in a filing cabinet at the office address. A separate consent form will be provided to enable you to choose if and how your images are used.

Who do we share information with?

We will only share and send information necessary to achieve business purposes. We will not share your information with your family unless we have your explicit consent or legal documents permitting us to do so. We send reports and correspondence to other professionals as required professionally to support your care. In all cases we will notify your GP of our involvement in your care unless there is specific reason you wish us not to that does not interfere with delivery of our services in a safe and transparent manner. We send invoices to the agreed fee payer.

Exceptions to the sharing of your personal data may be made to comply with applicable laws; to respond to governmental enquiries; comply with a valid legal process; or to protect our rights or property.

Ongoing consent

During the course of receiving services from Horizon Rehabilitation we will continue to check with you about your permission to use your data for specific purposes that arise e.g. sharing your information with another professional. We will document this permission in your clinical records.

Changing how we use your data

You can change your mind at any time about how we use data you have given additional consent for. E.g. receiving e-newsletters or use of your images. Please see the separate consent information for use of images. Some data will inevitably be irretrievable if consent has been given to share your data outside of Horizon Rehabilitation. Please get in touch with us to let us know what you would like to change.

Erasing your personal data

Please get in touch if you have a question about erasing your data. We will consider any request whilst also considering our legal obligations. If it is possible to delete the data you have requested, we will do so without undue delay. However, your personal and clinical information forms part of the legal documentation which we are obligated to keep by providing health care services to you so we may not be able to comply with a request to erase all personal data. We may also retain these records for so long as our legal counsel advises us to do so. We can however change how we process your information. For example, removing your personal contact details from our database once you stop receiving services.

Requests for information:

Please get in touch with us if you wish to receive a copy of any personal information that we hold on you. We may need to verify your identity and right to make this request. Horizon Rehabilitation will deal with requests from individuals for information within one month. If the request is particularly complex, up to a further two months may be required. We may charge a fee to cover reasonable costs associated with this request if it is repetitive. We will endeavour to keep you informed on the progress of your request. Please make any requests for Data Access in writing to the contact at the top of this policy.

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