Kingston Park Dental Practice - Website Privacy Statement

The www.kpteeth.com website and its webpages (the "Site") are operated by Kingston Park Dental Practice and Hosted by Wix.com

Our nominated representative for the purpose of the Data Protection Act is Andrew Gemmell – Andrew@KPteeth.com

Kingston Park Dental Practice and its partners are jointly referred to in this Policy as "We", "Us" or "Our".

For the purposes of this Policy, You as contracting party and possible (other) user/end-user are jointly referred to in this Policy as "you" or "your".

The purpose of this Policy is to set out the purposes for which, and the manner in which, we may collect and use personal information that we may obtain about you. By either registering as a user of any services provided by us on this Site and/or by using this Site generally you consent and agree to this use by us.

We ask that you read this Policy carefully as it contains important information about what to expect when we collect personal information about you and how we will use your personal data.

Your use of the Kingston Park Dental Practice Website governed by the online Terms and Conditions. Please ensure you have read and understood the Terms and Conditions in addition to this Policy.

1. Use of Personal Information

IMPORTANT

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy

If you decide to submit data to Kingston Park Dental Practice, for example by completing a 'contact us' form or by contacting us through email or telephone replies, or engaging in a chat function with one of our experts, we may use the information to add to a database in order that we can identify you as an individual a manage our relationship with you as a Kingston Park Dental Practice customer and update and improve the accuracy of our records. We also use that information as further described or referred to in this policy. We refer to any information that may identify you as an individual, such as your name and address, as personal data or personal information.

For example, we may collect the following personal information:

- name and job title
- age and date of birth
- contact information including email address
- other information relevant to customer surveys and/or offers

- information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service us
- information contained in or relating to any communications that you send to us or send through our website (including the communication content and meta data associated with the communication)
- any other personal information that you choose to send to us

Sometimes you may decide to submit personal information which is of a more private nature, which we refer to as sensitive personal information, and is required in order that we can, for example generate a product quote or perhaps to deal with your questions or administer your policy with us.

For example, we may collect the following sensitive personal information if you decide to give it to us and if we believe the processing of this data is necessary:

- ethnic origin
- physical health condition
- lifestyle information

What do we do with the sensitive personal information we gather?

In addition to personal information, we may require sensitive information in order to:

- provide you with quotes or other services you request
- to approve or allow you to purchase various products
- to administer and maintain your relationship with us

We may use information that you provide to us or that is obtained by us:

- to register You with our Site and to manage any account You hold with us;
- to fulfil our agreement with You and to process Your purchases and obtain payment;
- to analyse and profile Your purchasing preferences e.g. (market, customer and product analysis) to enable us to:
- to administer Our Site services;
- to contact you specific regard to that which you have requested, such as to arrange an appointment with Kingston Park Dental Practice
 - to provide You with a personalised browsing experience when using the Site; and
 - to review, develop and improve the products and services which We offer and to enable Us to provide and other customers with relevant information through Our marketing programme(s);
- to make decisions about you using computerised or automated technology, for example automatically selecting products and/or services which We think will interest you or from the information We have;
- to keep you informed of such products and services (including products and services of other companies within Kingston Park Dental Practice, our partners and carefully selected third parties) including special offers, discounts, offers, competitions and so on which We consider may be of interest to You by any of the following methods:

- Email;
- Telephone (including automated calls);
- SMS text messages and other electronic messages such as picture messaging;
- Post;
- Or otherwise.

Where required by law, Kingston Park Dental Practice shall obtain your prior opt-in consent at the time of collection for the processing of:

- personal data for marketing purposes,
- personal data deemed sensitive pursuant to applicable law, or
- personal data to be used for other data processing activities for which your consent may be required.

For details on how to ask to be removed from our mailing list(s), please refer to Sections 8-10 of this Policy.

We may store and process your information on our own information technology systems or on systems owned by third parties that may store and process your information on our behalf.

If you obtain the Services provided by Kingston Park Dental Practice on behalf of another person or make enquiries on their behalf, you will ensure that you obtain any Registered User's express consent to provide their details to us and will bring this Policy their attention before they commence using the Site.

2. Controlling your personal information

Whenever You are asked to fill in a form on the Website, use the check box to indicate your preferences and/or do not provide the relevant information (however, please note that if you do not provide all or correct information which we may request, we may not be able to provide you with the relevant quotation and/or services).

3. Crime Prevention

In order to protect our customers and us from fraud and theft, we may pass on information that we obtain from making identity checks and other information in our customer records, including how you conduct your account, to other companies and to financial and other organisations involved in fraud prevention and detection, to use in the same way. Without limitation to the foregoing we may disclose any information and data relating to you to the police or any regulatory or government authority in response to any request including requests in connection with the investigation of any suspected illegal activities.

4. Disclosure of Your Information

We may give information about you to the following companies and organisations that may use it for the same purposes as set out above:

- to employees and agents of Kingston Park Dental Practice located within or outside of the EEA and other approved third parties to administer any accounts, products and services provided to You by Kingston Park Dental Practice now or in the future;
- to agents who (on our behalf) profile Your data so that We may tailor the goods/services We offer to Your specific needs;

- to anyone to whom We transfer Our rights and duties under our agreement with You;
- our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy;
- if we have a duty pursuant to the law to do so or if the law allows us to do so.
- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and/or
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

5. IP Address

Your browser also generates other information, including which language the Site is displayed in, and Your Internet Protocol address ("IP address"). An IP address is a set of numbers which is assigned to your computer during a browsing session whenever you log on to the Internet via your internet service provider or your network (if you access the Internet from, for example, a computer at work). Your IP address is automatically logged by our servers and used to collect traffic data about visitors to Our Site. We also use your IP address to help diagnose problems with our server, and to administer our Site. We do not use Your IP address to identify you personally.

6. Security

We will treat all of your information in strict confidence and we will endeavour to take all reasonable steps to keep your personal information secure once it has been transferred to our systems. However, the internet is not a secure medium and we cannot guarantee the security of any data you disclose online. You accept the inherent security risks of providing information and dealing online over the Internet and will not hold us responsible for any breach of security unless this is due to our negligence or wilful default.

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

7. General

You have the right to know what personal data (as defined in the Data Protection Act 1998) that we keep about you, upon receipt of a written request to the address below and payment of a fee of $\pounds 10$. You also have the right to have any information we hold about You corrected if it is incorrect- if You are concerned that any of the information We hold on You may be incorrect, and You are unable to change it Yourself as described below, please contact Us at the address set out below.

Please be aware that Our Site may link to other Websites which may be accessed through our Site. We are not responsible for the data policies or procedures or the content of these linked Websites.

8. How can I get my name removed from the Kingston Park Dental Practice mailing list(s)?

If you want to be removed from our mailing list(s), please send an email to Info@KPteeth.com with the word 'remove' in the subject line and the email address that you wish to be removed within the email. If you agree to us providing you with marketing information, you can always opt out at a later date 9. How do I change any details stored on the Kingston Park Dental Practice Site?

To change any of your registered details, please contact info@KPteeth.com

10. Contact us

If you have any questions/comments about our privacy policy, you can email us at Info@KPteeth.com or you can write to us at 1 Stuart Court, Kingston Park, Newcastle.

11. Changes to policy

We keep our Privacy policy under regular review. We may amend and update this policy from time to time. Any changes in the future will be posted on this page. This Privacy policy was last updated on 23rd October 2017.

<u>CBCT Electronic Image transfer and cloud storage</u>

CBCT images are hosted by wetransfer.com for the purposes of sharing data with referring dentists. Data is password protected and the password to access the file sent separately to the referring dentist.

Data is stored securely WeTransfer servers in the EU.

Data is held to the highest standards possible because we're located in the E.U.

Our privacy and security standards are compliant with the high level of personal data protection required by the Dutch Personal Data Protection Act, based on the E.U. Privacy Directive (95/46/EC).

Files are encrypted when they are being transferred (TLS) and when they are stored (AES-256). Once your files are safely stored, they can only be accessed using the unique links sent to the sender and recipient. A password to access the files will be sent separately to referring dentist

WeTransfer are compliant with EU privacy law

Online referral form data. (Endodontic referral Form)

Data is processed through a third party provider '123 contact form'. They are fully compliant with the 8 principles of data protection;

1. Personal data shall be processed fairly and lawfully.

As the 'data processor', we ensure a secured 256-bit SSL connection while you are logged in the online endodontic referral account and provide the option to share secured SSL online forms to other people.

We will not use any kind of private data in ways that violate the Data Protection Act, but instead strengthen the privacy and safety of your account through a <u>2-step verification login</u>, as well as <u>form protection measures</u> from external threats (such as spams, viruses, malware). Kingston Park Dental Practice has a subscription with facilitates a secured SSL page and will be handled by Avangate, the payment gateway we use. For more information, follow our documentation on <u>how does Avangate handle 123ContactForm subscriptions</u>.

2. Data is obtained only for one or more specified and lawful purposes.

The online referral form requests information which is required for effective referral of patient to the practice. Once the referral has been processed, data can be removed from the service providers servers.

3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

We will never ask or request data or information which is not associated with the treatment referral account. The same applies to our users, as 'data collectors'on the web. Users that attempt to collect illegal and sensitive information (phishing) will be automatically blocked, as stated in our <u>terms of service</u>.

4. Personal data shall be accurate and, where necessary, kept up to date.

123ContactForm users are entitled to ask a customer support representative to update their account information whenever needed. Form owners can also enable an edit record option that will allow form submitters to edit their submissions at a later time to keep their data updated. This option is mostly useful for clinics or other institutions where profiles are created and saved in a database through form submissions.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary.

As subject of the Data Protection Act 1998 and other international regulations, we keep data not longer than necessary. Forms that are created on paid plan accounts can be recovered within a 30 day period after they have been deleted. Forms that haven't been requested to be recovered during this period will be permanently deleted from our hosting database.

6. Personal data shall be processed in accordance with the rights of data subjects.

All provided account data is returned with a copy by secure email to the data provider, as owner of the 123ContactForm account. Once the referral form has been received, data is held in accordance with our data protection policy.

7. Appropriate technical and organisational measures shall be taken against unauthorized or unlawful processing of personal data.

Hosted on Amazon Web Services, 123ContactForm is highly protected by any threats that could endanger our users. Our platform is carefully monitored on a 24/7 basis and benefits from all the latest updates that come along. Besides our 256-bit SSL connection, we are protected from spam, viruses and malware threats by <u>McAfee Secure</u>.

8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

All our data is kept and encrypted in secured data centres at Amazon Web Services, across the United States. Even though there isn't an equivalent in the US for the Data Protection Act 1998 of the UK and the EU's directive, there is a bilateral agreement between the parts that permits the transfer and keeping the data safe.

Data Protection Act compliance is not applicable without the direct responsibility of our users. Do not give away sensitive information regarding your account or data that might violate privacy laws. Also, collecting data in an act of phishing is highly forbidden and will not be tolerated.