



THE HAMPSHIRE AND ISLE OF WIGHT LOCAL DENTAL COMMITTEE (H&IOW LDC)

Privacy Policy

How your information is used and stored

This notice explains how your information may be held and used by us. We understand that we have a responsibility to protect and respect your privacy and look after your personal data. This Privacy Notice explains what personal data we collect, how we use your personal data, the reasons we may need to disclose your personal data to others and how we store your personal data securely.

1. About the H&IOW LDC

The H&IOW LDC was established on the 13th June 2007, under a PCO approved and modified BDA model Constitution. LDCs in England and Wales were established in 1948 at the inception of the NHS. Established in statute under Section 45b of the 1977 NHS Act as modified by the 1999 Health Act and included in the NHS Act 2006.

The H&IOW LDC is registered with the Information Commissioner and its accounts are prepared by chartered accountants; Rothmans.

2. What information we hold about you

By “information” we mean all of the personal and financial information about you that we collect, use, share and store. We can only keep and use information for specific reasons as set out in law. This can include but is not limited to:

- Your name
- Your given address,
- Your telephone/Fax number(s),
- Your email addresses
- Meetings (ECPD and advisory) attended by you,
- Your bank details,
- All payment(s) made by or to you.

3. Collection of information

We collect personal information directly from you. This will be from phone calls, emails, letters, and any forms we ask you to fill in. We also collect information from other professional bodies or organisations (Indemnity providers, NHSE, Legal representatives, HEE, PHE), for audit purposes only.

4. Why we need the information

The General Data Protection Regulation (2018) requires us to have one or more of five reasons for using your information. These are the H&IOW LDC's reasons:

- I. **'Contract performance'** – the information needed to deliver the service we are providing.
- II. **'Legitimate interest'** – we are using your information as the benefits of so doing are legitimate, and we have an interest in providing an accurate service.
- III. **'Consent'** – we obtain your consent to use information in a particular way and to record this, so that we can communicate with you and others. You have the right to change your mind and change or withdraw your consent.

5. How we use your information

These are the main ways we will use your personal information

- I. To manage your relationship with us, including communicating with you about meetings, website updates, NHSE-South(Wessex) communications, notices and for providing any guidance and/or instructional information;
- II. To help to resolve any problems or complaints you may have;
- III. To improve our services and computer systems;
- IV. To manage and organise our business, as we have a legitimate interest in organising and running the H&IOW LDC in a correct and commercially sensible way and to comply with our legal responsibilities under the GDPR.

You have a legal right to tell us at any time that you do not want us to use the information we hold in this way or to withdraw any consent that you have given to us.

We will only contact you in ways that are acceptable to you.

6. Accuracy

We will endeavour to ensure that the information we have about you is accurate and up to date;

7. With whom we may share information

When using the personal information we hold we may share it with other people or organisations that are associated with us, to assist us in delivering our service accurately. We will treat the personal information we hold as confidential, but may share the information about your professional activity (in relation to our representative functions) with organisations that have a legitimate interest in receiving this information.

For the avoidance of doubt, we do not and never will sell your personal information to third parties for marketing or advertising purposes.

8. Using information outside the European Economic Area (EEA)

We will not normally need to share or otherwise use your information outside the United Kingdom.

If there is an overwhelming reason to share or use your information outside the UK, in these cases we will take all reasonable steps necessary to make sure we obtain your prior permission and that your information is protected to UK standards.

9. Security of information

The H&IOW LDC protects personal information against unlawful or unauthorised processing and accidental disclosure. IT security will follow the Government's National Cyber Security Centre's guidance for small businesses.

10. How long we hold information

We do not keep your information for longer than we need to, which is usually up to seven years after your relationship with the H&IOW LDC ends, unless we are required to keep it longer - for example, due to a court order or investigation by the tax authorities, (see point 14.1 below).

11. Your legal rights in relation to your information

The law guarantees you rights in relation to your personal information. We have set out details of your rights below under individual headings.

12. Access to information

You always have the right to ask whether or not we hold information about you. And if we do, what the information is, why we are holding it and the ways it is being used. You are also entitled to a copy of the information.

13. Rectification of information

We always want the information we hold to be up to date and accurate. If any of the information we hold is either incorrect or out of date, then please inform us and we will fix it.

14. Erasure of information

- I. All personal information that we hold for you will normally be securely erased from all sources in which it is held no more than 7 years after our relationship has ended. However, we may need to retain it longer, as we may not be able to delete your information after this time, due to our legal and/or financial obligations.
- II. You have the right to ask us to erase or delete information where you consider there is no longer any justification for us to hold it, either because:
 - You believe that the information is no longer needed for the reasons we collected it;
 - We held and used the information based only on your consent, which you have now withdrawn;
 - You have previously objected to a way in which we use the information;
 - You believe that we have been using the information unlawfully;
 - You believe that there is a legal obligation on us to erase the information.
- III. When you make a request for information to be erased we will have up to one calendar month to respond. If we reject your request we will inform you and set out the reasons why we will not erase or delete the information.

15. Portability of information

You have the right to receive from us some of the information that you provided in a machine-readable format.

16. Objecting to our use of your information

We have noted above the ways in which we use the information we hold. Where we have told you that any use of information is based on 'legitimate interest', you can raise an objection to that use. When you make an objection we will respond to you within one calendar month. We will stop using the information in this way unless we disagree that we should because of a compelling legal justification for continuing to use it. We will always advise you about this justification.

You can always simply opt out of receiving marketing communications from us at any time. You can do this by contacting us in the usual way.

17. Restricting some uses of information

In certain circumstances you have a right to block or limit the use of information by us. This may arise where:

- You have challenged the accuracy of the information we hold and we are verifying this;
- You have objected to a use of the information (see above) and we are considering whether your objection is valid;

- We no longer need to keep the information but you have asked us to hold it because of legal claims in which you are involved.

18. Contacting us for further Information about your rights

You should contact us in the normal way to discuss how we hold and use your information, and your rights.

Your first contact should be to our Data Controller, the Secretary of the H&IOW LDC, who is currently Keith Percival keith.percival ldc48@gmail.com

19. Who can I complain to?

If, for whatever reason, you are unhappy with how we are using your personal information you should contact the Secretary in the first instance, so that we can understand your issue and try to resolve it.

If we cannot resolve the issue, you have the right to complain to the Information Commissioner's Office (ICO). For further information visit: ico.org.uk