



PRIVACY POLICY

This Privacy Policy is effective as of 1st June 2023.

The Levant Clinic Limited, trading as The Levant Clinic, is committed to protecting and respecting your privacy.

The Levant Clinic understands that your personal data is entrusted to us and appreciates the importance of protecting and respecting your privacy. To this end we comply fully with the data protection law in force in the UK including UK GDPR and the Data Protection Act 2018 ("Data Protection Laws") and with all applicable clinical confidentiality guidelines.

This Privacy Policy sets out the basis on which we collect and process personal data about you including our practices regarding the collection, use, storage and disclosure of personal data that we collect from you and/or hold about you, and your rights in relation to that data.

This Privacy Policy applies to anyone who receives services at or from The Levant Clinic so please read the Privacy Policy carefully to understand how we process your personal data. By providing your personal data to us or by using our services, website or other online or digital platform(s) you are accepting or agreeing to the practices as described or referred to in this Privacy Policy.

About us

For the purpose of Data Protection Laws, the data controller is The Levant Clinic Limited, trading as The Levant Clinic, with registered address at Hunt House Farm Frith Common, Eardiston, Tenbury Wells, Worcestershire. WR15 8JY.

We are registered with the Information Commissioner's Office under registration number ZB549848. We are the data controller for the purpose of the EU General Data Protection Regulation ("GDPR"). Our designated Data Protection Officer can be contacted at info@thelevantclinic.co.uk

The type of personal information we collect

Personal data or personal information means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of information about you which we have grouped together as follows:

Personal Data:

- **Identity Data** – information that you provide to us for the purpose of enquiring and registering with us. Information relating to employees, director(s) and shareholders. The information includes first name, maiden name, surname, marital status, title, date of birth, gender and passport number.
- **Contact Data** - includes a billing address, delivery address, email address and telephone numbers.



- **Interaction data** - details of your contact with our clinic or online. For example, we may make notes of conversations and maintain telephone call logs.
- **Financial Data** - includes bank account and payment card details.
- **Transaction Data** - includes details about payments to and from you and other details of products and services you have purchased from us.
- **Profile Data** - includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** - includes information about how you use our website, products and services.
- **Complaint Data** – includes information regarding complaints made to The Levant Clinic. We record the complainant's name, date of birth, address, telephone number, representative, nature of complaint, learning identified, method of handling and complaint outcome.
- **Marketing and Communications Data** - includes your preferences in receiving marketing from us and your communication preferences.
- **Cookies and service logs** - as you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.
- **Web beacons** - we also include web beacons (also known as clear gifs) in our emails to track the success of our marketing campaigns. This means that if you open an email from us we can see which pages of the websites you visit. Our web beacons do not store additional information on your computer but by communicating with our cookies on your computer they can tell us when you have opened our email. If you object to web beacons, we recommend you follow the instructions for deleting existing cookies and disabling future cookies above. We will still know how many of our emails are opened and we will automatically receive your IP address, a unique identifier of your computer or other access device, but we will not identify you as an individual.
- **Third parties or publicly available sources** - We may receive personal data about you from various third parties, including healthcare provider(s) and anyone instructed to act on your behalf.
- **Technical data from the following parties** - analytics providers such as Google based outside the EU; they may provide us with special categories of personal data.

Special Categories of Data:

- **Healthcare Data** – it is considered more sensitive than personal data. It includes information regarding the treatment you wish to (or have) received from us, your G.P. details, other medical practitioners and professionals involved in your treatment or care, medical reports, your NHS number, results of laboratory tests or other medical tests. Depending on the treatment, photographs may also form part of your treatment record.

With the exception of healthcare data, we do not collect any other special categories of personal data about you (race or ethnicity, religious beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data).



Aggregated Data

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

When we collect your personal information

We may collect personal data about you when you:

- visit one of our websites
- communicate with us by phone or email or instant messaging systems
- engage with us on social media
- interact (open/click) with our emails
- request further information from us
- register to be a customer or patient with us or book to receive any of our services or treatments
- attend appointments and as part of the consultation process
- are referred to us by a third party
- fill in a form or survey for us
- carry out a transaction on our website
- participate in a competition or promotion or other marketing activity
- refer a friend
- give us some feedback and reviewing our services
- make payments to us or require a refund
- participate in interactive features on any of our websites.

Why we use your personal information

Our goal is to provide you with an exceptional experience right from the start of our interaction. To accomplish this, we believe it's important to gain a deeper understanding of your needs and preferences by gathering data about you. This information is used to enhance our services and ensure that we share relevant and engaging information that aligns with your interests. In certain situations, we have a legal obligation to collect and process data about you, either to fulfil our contractual commitments to you or to comply with applicable laws and regulations. The following are the specific purposes for which we use your personal data:

- To contact you regarding an enquiry – we collect and process your personal or healthcare information to provide you with further information or to book an appointment



- To provide you with further information about the subject of your enquiry so you understand your options and can make an informed decision
- To provide you with our services - to enable us to carry out our obligations to you arising from any contract entered into between us and you including relating to the provision by us of services or treatments to you and related matter such as billing, accounting and audit, credit or other payment card verification and anti-fraud screening
- To remind you by email to book subsequent appointments for a treatment you have previously had which requires ongoing review
- To contact you regarding appointments and treatments – so that you don't miss your appointments.
- For business performance analysis – to ensure we continue to provide the best service.
- To make sure we're speaking to the right person – to help prevent and detect fraud.
- To take payment and process refunds
- To provide customer service and support
- To comply with any applicable law or legal obligation or as necessary in the public interest of for the protection of a person's vital interest
- We have your explicit consent for example: direct consumer marketing communications or photograph publication. Generally, we will only ask for your consent to processing if there is no other legal grounds to process. In these circumstances, we will always aim to be clear and transparent about why we need your consent and what we are asking it for. Where we are relying on consent to process personal data you have the right to withdraw your consent at any time by contacting us using the details below and we will stop the processing for which consent was obtained.

To process **special category data** (as detailed in the 'The type of personal information we collect' section) we rely on additional legal grounds and generally, they are as follows:

- With your explicit consent
- It is necessary for the purposes of preventive or occupational medicine, to assess whether you are able to work, medical diagnosis, to provide health or social care treatment, or to manage health or social care systems and services. This may also include monitoring whether the quality of our services or treatment is meeting expectations
- It is necessary to establish, make or defend legal claims or court action
- It is necessary so that we can comply with employment law
- It is necessary for a public interest purpose in line with any applicable law or legal obligation.



When and why we pass your personal information to a third party

We may share personal information, including healthcare data, with third party providers outside of our company, if necessary.

Third party providers include:

- **Hospitals** - If you have booked a procedure that is to be performed under local or general anaesthetic, we will share your information with the hospital booked for the procedure
- **Healthcare providers** - we may also share your information with other relevant healthcare providers
- **Finance companies** - when completing purchase and financial credit requests
- **Persons acting on your behalf** - instructed by you
- **Companies –**
 - supporting our website, phone handling, IT and other business systems
 - facilitating the delivery of our emails and electronic communications
 - providing online communication platforms, such as messaging and video conferencing systems
 - that provide analytical services, such as Google Analytics
 - acting on our behalf following a complaint or legal proceedings
 - providing products or services related to your procedure(s)
- **Other third parties** - In some circumstances we are legally obliged to share information, for example under a court order. We will satisfy requirements that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

We share aggregated demographic information with our partners and advertisers. We may use an outside shipping company to ship orders, and a credit card processing company to bill users for goods and services. These companies do not retain, share, store or use personally identifiable information for any secondary purposes beyond filling your order. We may partner with another party to provide specific services. We will share names, or other contact information that is necessary for the third party to provide these services. These parties are not allowed to use personally identifiable information except for the purpose of providing these services.

How we store your personal information

We take the privacy and security of your personal information seriously and take all appropriate steps to protect it from unauthorised access, loss or misuse. We never sell your personal data for any purpose. And we do not use any sensitive data for marketing purposes.

We only retain your information for as long as is necessary to fulfil the purpose for which it was collected, including for the purposes of satisfying any legal, accounting or reporting requirements. Medical records are kept for 8 years after the conclusion of treatment, but there may be times when records need to be kept for longer.



At the end of the period, your data will either be deleted or anonymised so that it can be used in a non-identifiable way for statistical analysis which helps us make improvements to our service and business.

How we protect your information

We are dedicated to ensuring the security of your data and employ all necessary measures to prevent unauthorised access, loss, and misuse. We do not sell your personal data under any circumstances. The privacy and the security of your data are fundamental to our practices.

How to stop receiving marketing messages from us

There are several ways you can stop receiving marketing messages from us:

- Click on the "unsubscribe" link located at the top or bottom of any of our marketing emails.
- Reply directly to any of our marketing emails, requesting to be unsubscribed.

Please note that these actions will only unsubscribe you from emails that are not related to booking confirmation, payment confirmation, or medical aftercare. You may still receive essential email communications from The Levant Clinic, such as appointment confirmations.

Usually, your request will be processed immediately. However, in some cases, it may take a few days for the changes to take effect, and you may receive emails from us during this transition period.

If you have previously unsubscribed but wish to receive our emails again, please inform us by calling or notifying a staff member. We will send you an email request that you need to open and accept to resume receiving our emails.

Your data protection rights

You have many rights in relation to your personal data:

- **Your right of access** - You have the right to ask us for copies of your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances. This enables you to ask us to delete or remove personal information where there is no valid reason or legal requirement for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances. This enables you to ask us



to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

If you want to exercise your rights in respect of your personal data, the best way to do so is to contact us by email on info@thelevantclinic.co.uk. In order to protect your privacy, we may ask you to prove your identity before we take any steps in response to such a request.

Children

We are committed to not knowingly collecting personal data of children under the age of 16. If you are a parent or guardian of a child under the age of 16 and believe that we may have information relating to that child, please reach out to us. We will request you to provide evidence of your relationship with the child. Once you have successfully proven your relationship (subject to applicable law), you may request access to and deletion of the personal data of that child.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us by phoning or emailing us:

- Telephone: 020 3084 0861
- Email: info@thelevantclinic.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

- The ICO's address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
- ICO Helpline: 0303 123 1113
- ICO website: www.ico.org.uk
- Our ICO Registration ZB549848



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Privacy policy updates

If a material change is made to this privacy policy, the effective date is revised. By continuing to use our websites and services after a revision takes effect, it is considered that users have read and understand the changes.