

PRIVACY POLICY

Turner MPM ("We, us, our") are committed to protecting and respecting your privacy.

This document refers to personal data, this is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

This policy (together with our [Terms of Website Use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Privacy is the confidentiality of your personal information and this is of paramount concern to us.

Please read this privacy policy carefully to understand how we process your personal data. By visiting <https://turner-mpm.co.uk> (the "Site"), you indicate your agreement for us to use your personal information as set out in this Privacy Policy.

The Data Protection Act (DPA), Privacy and Electronic Communications Regulations (PECR) and The General Data Protection Regulations (GDPR) which is EU wide and far more extensive, seek to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain such as Companies House data.

We are registered with the Information Commissioner (ICO) as required under the Data Protection laws in the United Kingdom and we are committed to compliance with Data Protection legislation, The General Data Protection Regulations, Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 (UK Regulations), medical confidentiality and NHS Information Governance guidelines.

For the purposes of the Data Protection Act 1998 and the General Data Protection Regulations (GDPR) (the "Act") which is EU wide, the data Controller for Turner-MPM is **Mrs Deborah Turner, ICO Registration Number: Z9897011.**

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.

Data Protection by Design and Data Protection Impact Assessments (DPIA's)

It is good practice to adopt a Privacy by Design approach and to carry out a Privacy Impact Assessment (PIA). As part of this process we have installed the following systems within our business; upgraded IT hardware, Cloud based software solutions with encrypted communications, enhanced Firewall and Anti-Virus software to meet compliance with GDPR.

Who are we?

Turner-MPM (Turner Medical Practice Management, Accounts and Medicolegal Administration) provide secretarial, accounting and administration services to our clients who are medical Consultants, GP's and Medicolegal Experts working in the private healthcare sector. We are based solely in the United Kingdom.

What personal data may we collect from you?

When we refer to personal data in this Policy, we mean information that can, or has the potential to identify you as an individual. Accordingly, we may hold and use personal data about you as a customer, or in any other capacity, for example, when you visit our website or speak to us, including but not limited to personally-identifying information like Internet Protocol (IP) addresses. Turner-MPM may from time to time use such information to identify its visitors. We may also collect statistics about the behaviour of visitors to our website.

Personal Data:

- Name
- Address
- Email Address
- Photograph
- IP Address
- Location data
- Online behaviour (Cookies)
- Bank Account details

In you making initial contact with us you consent to us contacting you to discuss your business requirements.

We will only collect the information needed so that we can provide our Clients with the services we offer, we do not sell or share your data with third-parties.

Turner-MPM acts on behalf of its Clients (the Medical Consultants, GP's and Medicolegal Experts for whom we provide services) solely as Data Processors and in this capacity, we act on the instruction of our Clients who are also committed to DPA & GDPR compliance.

Cookies

We use several different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit <http://www.aboutcookies.org> for detailed guidance.

Our website is built on a 'Weebly' Platform. Weebly participates in, and has certified its compliance with, the [EU-US Privacy Shield Framework](#).

By accepting the Cookie notice on our website we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete the cookies having visited the site, or you should browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)

Lawful basis for Processing any personal data

The law on Data Protection is derived from various pieces of legislation. These include the Data Protection Act and the incoming General Data Protection Regulation (the 'GDPR') which will become enforceable in May 2018. The GDPR states that personal data (information relating to a person that can be individually identified) can only be processed if there is a legal ground to do so. Activities like collecting, storing and using personal information would fall into the GDPR's definition of processing.

The GDPR provides six legal grounds (reasons) under which personal information can be processed (used) in a way that is lawful:

- Processed lawfully, fairly and transparently
- Collected only for specific legitimate purposes
- Adequate, relevant and limited to what is necessary
- Must be accurate and kept up to date
- Stored only for as long as is necessary
- Ensure appropriate security, integrity and confidentiality

Turner-MPM may process your information for a number of different purposes. Generally, we rely on the following legal justifications or 'grounds';

- i. Taking steps at your request so that we can enter into a contract with you to provide practice management, secretarial, administration, accounts and medicolegal support services.
- ii. We have an appropriate business need to process your personal information and such need does not cause any harm to you. We rely on this for activities such as quality assurance, maintaining our business records, monitoring satisfaction and responding to queries or complaints.
- iii. By signing our Processing agreement and agreeing to the terms in this Privacy Notice, you consent to our using your personal information.
- iv. You can withdraw your consent at any time by phoning 01937 541035 or emailing DataProtection@Turner-mpm.co.uk
- v. A contract with you that we can only fulfil by using your personal information, e.g. to send you an item that you have requested or provide a service.
- vi. One legal ground for processing personal data is where we do so in pursuit of legitimate interests and those interests are not overridden by your privacy right. Where we refer to use for 'appropriate business needs', we rely on this ground.

Legitimate interests pursued by Turner-MPM

To promote the Practice Management, Secretarial, Accounts and Medicolegal services offered by Turner-MPM and the provision of these services to our Clients.

Disclosure

Turner-MPM may pass on your personal information to third parties exclusively to process work on its behalf, such as IT technical support or Software support and to subcontract secretarial service suppliers. We require these third parties to agree to process any information shared on the basis of

our instructions and requirements in accordance with this Privacy Policy, the DPA, GDPR or any other relevant regulations. We may disclose your personal information to meet legal obligations, regulations or valid Government requests.

Retention Policy

We process personal data only for the duration of any contract we have between us and continue to store only the personal data necessary to fulfil the current guidelines. Normally, this is for 6 years after any contract between us has expired to meet our legal obligations to do so. After 6 years our personal data will be deleted from our electronic records and any physical records will be confidentially destroyed (shredded).

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, secure servers inside the European Economic Area (“EEA”). It may be processed by staff operating inside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site or systems, you are responsible for keeping this password confidential. **You must not share a password with anyone.**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access, and encryption software to transmit personal information.

Your rights as a Data Subject

The GDPR provides the following rights for individuals regarding possession or processing of your personal data:

- **The right to be informed** – fair processing information must be provided; typically, through a Privacy notice
- **The right of access** – you have the right to request a copy of the information we hold about you (SAR, see below)
- **The right to rectification** – you have a right to correct data that we hold about you if it is inaccurate or incomplete
- **The right to erasure (to be forgotten)** – in specific circumstances, such as when the personal data is no longer necessary, you can ask for the data we hold to be erased from our records
- **The right to restrict processing** – in specific circumstances, you have a right to restrict processing
- **The right to data portability** – you have the right to move, copy or transfer the personal data we hold about you to another person/organisation
- **The right to object in relation to automated decision making and profiling** – you must have grounds relating to your own particular situation to exercise this.

Subject Access Requests (SAR) - You can request what information Turner-MPM holds about you and how it is processed

You can request to see a copy of the information we hold about you, provided this request is made in writing, you can ask for the following information:

- The name and contact details of the person or organisation that has determined how and why to process your data
- Contact details for the Data Protection Officer / responsible person
- Purpose and legal basis for the processing of your data
- Categories of personal data collected, stored and processed
- Who the data will be disclosed to
- Our storage policies
- Details of your rights to correct, erase, restrict or object to processing
- How to exercise your right to withdraw consent, at any time
- Complaining to the ICO if you are not happy with the way your data is processed
- Whether the provision of personal data is a statutory or contractual requirement, or is necessary to enter into a contract; if you are obliged to provide the personal information are there consequences of failing to provide the data?
- Third party source of information (if not supplied by us)
- Details of automated decision making, such as profiling and explanation of the reasoning for this, significance and any likely consequences of such processing

Accessing your Personal Data

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 DataProtection@Turner-mpm.co.uk or Telephone: 01937 541035 in the first instance.

To protect your privacy, we will ask you to prove your identity before we take any steps in response to such a request. Acceptable forms of ID when information regarding your personal data is requested are:

- Photo Driving Licence
- Passport
- Birth Certificate
- Utility Bill or Bank Statement (no older than 3 months)

At least one piece of photographic ID is required, along with proof of current address (utility bill or bank statement).

Emails

The emails that we send you have no tracking at all e.g. service emails with invoices attached.

Complaints

Should you wish to make a complaint about how we process your personal data, you have the right to complain to Mrs Deborah Turner, Principle – Turner-MPM. debbie@turner-mpm.co.uk or Tel: 07778 393039.

If you do not receive a response within 30 days, you have the right to complain to the ICO whose address is: Wycliffe House, Water Lane, Wilmslow, SK9 5AF. www.ico.org.uk