

**1. GENERAL**

Newby and Padley (“We”) recognize that personal privacy is an important issue and we support the protection of your personal details and internet privacy as required by legislation.

This policy explains what type of personal data we hold, how this information will be used, how it is stored and how you can access or request deletion of this personal data.

We comply with the current Data Protection Act 2018 which came into force on the Isle of Man from 1<sup>st</sup> August 2018. This incorporates the General Data Protection Regulations (GDPR), which were adopted in the U.K. in May 2018

The Data Controller is Mr John Padley, Partner, Newby & Padley Optometrists, 9 Village Walk, Onchan, Isle of Man, IM3 4EB.

**2. STORAGE AND USE OF PERSONAL DATA**

The principles of the new regulations are similar to the previous regulations and state that we are only allowed to store personal data if we have good reason to do so.

We must be able to demonstrate that personal data is:

- a) processed lawfully, fairly and transparently
- b) collected and used for specific and legitimate purposes, and not used in an incompatible way with those purposes
- c) adequate, relevant and limited to what is necessary for the intended purposes
- d) accurate and where necessary kept up to date - e.g. errors can be rectified without undue delay
- e) kept in a way that permits identification of an individual no longer than is necessary
- f) kept secure using appropriate technical and organizational measures.

The following table outlines the personal data we hold, what it is used for, who it is shared with, how long it is kept and the steps taken to ensure it is secure.

Category of personal data and data subject	Legal basis for processing personal data	Who these personal data are shared with	Time limits for erasure	Technical/organisational security measures to ensure level of security appropriate to risks
Patient records – including retinal photographs, referral letters etc.	Legitimate interest and for the purposes of health care .  For the completion of occupational sight standard forms	Registered health care professionals and those under their supervision.  Shared with patient’s employer with employee consent	In line with the recommendations of the College of Optometrists best practice we keep records and data for 10 years from the date of the last visit. Records for children are retained until they are 25 AND it is 10 years since they were last seen.	Only staff have access to the complete patient record. All registered staff ensure that they respect patient confidentiality. Paper records are kept securely. Electronic data is password protected. There is a back-up system that means data can be restored.
Staff records – includes bank details, NI number, and other personal information	Performance of a contract with the data subject or to take steps to enter into a contract and processing is necessary for carrying out obligations as an employer. Legitimate interests.	Government Officials	Kept for tax purposes and future claims/information	Paper records are kept securely. Electronic data is password protected. Employer only can only access the information. There is a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.
Customer records – e.g. standing order/payment details	Legitimate interest	Not shared	Kept for tax purposes and future claims / information	Paper records are kept securely. Electronic data is password protected. Employer only can access the information. There is a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.

### **3. COLLECTION OF PERSONAL DATA**

Newby and Padley may collect and process personal information about you. You may give us information about yourself by filling in appointment request forms on our website, face to face or by corresponding with us by telephone, email or otherwise.

### **4. DISCLOSURE OF PERSONAL INFORMATION**

We may disclose your information to third parties, if we are under a duty to disclose or share your personal data in order to comply with any legal obligations. In the event that we sell our business, we may transfer your personal data to the new owner of the business as one of the assets.

We will not sell, license or trade your personal data to others. We do not provide your personal information to any direct marketing companies or other such organisations.

### **5. ACCESS TO INFORMATION**

The Act gives you the right to access the information we hold about you by making a subject Access Request (SAR). Upon receipt of an SAR we will take all reasonable steps to ensure that this is completed in an expeditious manner and in any event will be no longer than one month.

### **6. YOUR RIGHTS**

Right of Access : you have the right to access the information we hold about you by making a subject Access Request (SAR).

Right to Rectification : you have the right to request that any incorrect Personal Data we hold about you is corrected, if that information is inaccurate or incomplete. We will take all reasonable steps to ensure that this is completed in an expeditious manner this should be will be no longer than one month.

Right to Erasure : you have the right to request that your Personal Data is deleted. This applies where there is no compelling reason for its continued processing. This is also known as the 'right to be forgotten'.

Right to Objection : you have the right to object to us using your personal data in certain circumstances, for example direct marketing.

These requests can be made in writing to Mr John Padley, Partner, Newby & Padley Optometrists, 9 Village Walk, Onchan, Isle of Man, IM3 4EB.

### **7. CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on the privacy page of our website. Please check back frequently to see any updates or changes to our policy.

### **8. CONTACT**

If you have any questions or comments regarding this privacy policy then please contact us at [nponchan@manx.net](mailto:nponchan@manx.net)