

# CLARITY

## Privacy Policy

### Introduction

Community Health and Eyecare Limited trading as Clarity & Clarity Edinburgh Ltd are both companies registered in England and Wales.

Community Health and Eyecare Limited, company number 07296068, is registered at 1-6 Star Building, Caxton Road, Fulwood, Preston, United Kingdom, PR2 9BS.

Clarity Edinburgh Ltd, Company number 15884574, is registered at 1-6 Star Building, Caxton Road, Fulwood, Preston, United Kingdom, PR2 9BS.

Both Companies are collectively referred to throughout this document as 'Clarity'.

At Clarity we are dedicated to protecting and maintaining your privacy and this Privacy Policy outlines how Clarity and any group company (Company, We and Our) may collect, use, share and store personal data of those that contact us or use our website in connection with the services we provide or otherwise contacts us including on behalf of any patient under our care.

### What is the Purpose of this notice?

Clarity is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. At Clarity, we pride ourselves in the care and service we provide to all. This includes handling personal data in a responsible manner and maintaining your privacy. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights. This notice makes you aware of how and why your personal data will be used and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulations and Data Protection Act 2018.

### What is Personal data?

Under the UK's General Data Protection Regulation (GDPR) personal data is defined "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person"

### How is your personal data collected?

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Clarity may use different methods to collect data from and about you including through:

**Direct Interactions.** You may give us your personal information voluntarily by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Enquire about our services whether as a patient, candidate or through other interests
- Contact us via our website
- Request marketing materials be sent to you
- Enter a competition, promotion or survey, or
- Give us feedback or contact us

**Automated Technologies or Interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies as outline within our Cookie Policy found on our website.

**Third Parties or Publicly Available Sources.** We will receive personal data about you from various third parties and public sources including but not limited to such sources legal to do so and/or NHS, other healthcare providers, institutions, or people you have authorised to provide information on your behalf (for example, parents, guardians, those with power of attorneys), third party service providers, and others.

## How and why, we may use your information.

Clarity will collect and use your personal data for the purposes of:

- Fulfilling healthcare needs
- For you to remain well informed with regard to your care and treatment, including notification of any appointments or updates
- Responding to all queries
- Helping us to reflect on, review and improve the service we provide
- Obtaining patient feedback
- To comply with laws, regulations and contractual obligations applicable to Clarity
- Maintain records required for compliance with laws
- Managing and administrating complaints and claims
- Fraud prevention and detection
- Engaging in effective relationships with suppliers and other third-party companies
- Conducting business processes including but not limited to operational processes, resourcing and recruitment and marketing and engagement.
- Maintaining health and safety of members of the public, our staff and our customers/patients

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In order for Clarity to provide you with the best service, where we need to collect, use, share or store personal data in any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

Clarity take reasonable steps to make sure your personal information is adequately protected in line with the requirements of the UK data-protection law. However, we have no control over the contents of other websites or resources which are linked to our website. We accept no responsibility for them or the privacy practices they use, or for any loss or damage that may arise from you using those websites or resources.

## How will Clarity use the personal data it collects about you and how long will this information be kept for?

Clarity will collect, use, share and store the information you provide in a manner compatible with the UK's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is legally necessary. Clarity is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

## Share your Information.

We may pass your personal data on to third-party service providers contracted to Clarity including but not limited to optometrists, medical practitioners, health care providers or the NHS while providing you with an effective service. We may reveal personal information to health authorities, including NHS or national equivalent bodies. We may pass your personal information to others to keep to any legal obligation (including court orders), to enforce or apply our [terms and conditions of use of website](#) or other agreements we have with you, or to protect our rights, property and safety or those of our customers, employees or others. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only until they no longer require your data to fulfil this service. They will dispose of the details in line with Clarity's procedures. If we wish to pass your sensitive personal data on to a third party, we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

We do not share data with any companies or organisations outside of the UK or EEA, unless in exceptional circumstances such as if the patient we treat is from overseas and wishes to forward a copy of their records to their healthcare practitioners overseas, we will require written signed consent before we share this data. In circumstances when the data is requested to be forwarded electronically, we will do so utilising a secure email system. If encryption is required, we will do so however we take no responsibility if the contact details provided by the patient, or the healthcare provider is incorrect and results in the data being sent to a different party

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## When will Clarity contact you?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

## Finding out about the Personal Data Clarity holds

### Data Subject Access Requests

You have certain rights under the UK data protection legislation to request access to the personal information we hold for you. Clarity will require your request in writing. We may charge a fee if we are allowed to do so by law. In order to access this information, we will require you to complete a DSAR form, which is available upon request. We would also require two forms of ID, one photographic and one proof of address for where you wish the records to be sent and if you want them sent electronically.

### Other Requests

Other than requests for access to your records, requests could also include a request to/for:

1. Correct your personal information if it is inaccurate or incomplete;
2. Erase your personal information and prevent further processing in specific circumstances and where there is no other legal reason for us to continue keeping or processing that information. These include for example:
  - if the personal information is no longer needed in relation to the purpose for which it was originally collected or processed;
  - if you withdraw your permission;
  - if you object to us processing your personal information;
  - if you ask us to stop processing your personal information (although we are entitled to store your personal information, we cannot further process it if you ask us not to);
  - Contact details of the Data Protection Officer, where applicable.
  - The purpose of the processing as well as the legal basis for processing.
  - If the processing is based on the legitimate interests of Clarity or a third-party, information about those interests.
  - The categories of personal data collected, stored and processed. Recipient(s) or categories of recipients that the data is/will be disclosed to.
  - If we intend to transfer the personal data to a third country or international organisation outside the UK, information about how we ensure this is done securely.
  - How long the data will be stored.
  - Details of your rights to correct, erase, restrict or object to such processing. Information about your right to withdraw consent at any time.

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- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## What should you do if your personal data changes?

If you become aware that the personal data Clarity holds is inaccurate or if any of your personal data changes, where possible, we ask that you inform Clarity of such changes at the earliest possible convenience. This will allow us to ensure continued care and service. We will not be deemed responsible where data held is incorrect and this results in missed communications or any other inconvenience or loss.

## Updating our Privacy Policy

We may update this privacy policy from time to time. Any updates will take effect as soon as they are posted on our website.

## Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our DPO at [dpo@chec.uk](mailto:dpo@chec.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues