

In providing you our medical services and products, we receive, use and share personal data about you. The information contained in this privacy notice tells you how your personal data is collected, used and shared by Lumley Aesthetics LLP. You can find out more about us at our website: www.lumleyaesthetics.co.uk

Lumley Aesthetics LLP is registered with the Care Quality Commission and owned by Dr C Lumley LDS RCS Eng who is registered with the GDC (General Dental Council) and Mr E J Lumley who is registered with the RCT (Register of Clinical Technologists) . Lumley Aesthetics LLP is registered in England and Wales under registration number OC336101 and our registered office is at 383 City Rd, London EC1V 1NW.

Your information will only be held, used and shared on your behalf by the two partners of Lumley Aesthetics LLP.

This privacy notice covers the following:

1. What information we collect and where we get it from
2. What legal grounds we rely on to process your data
3. How we use your information
4. How we handle your information
5. Who we share your information with
6. Safeguarding your personal data
7. How long do we hold your information for?
8. Your legal rights
9. Updates to this privacy notice
10. How to contact us, complain or request access to your personal data

1. What information we collect and where we get it from

We receive your personal data from you directly, or generate the data ourselves (for example, during the provision of our services we generate medical records about you). The type of information may include the following:

Type of personal data	Description	Purpose for processing it	How long we store it for
Your identity and contact details	Your full name, and other information that may be obtained to verify your identity, residential address, mobile telephone and/or landline number, e-mail address, etc.	Providing you with a medical treatment or product and notifying you about any changes to the product or the provision of the service; Providing you with advice about our availability for appointments; Providing medicines through Prescription, etc.	Data about your identity will be stored for up to seven years after your last appointment, unless we are legally obliged to keep them for longer. Any personal data held will be deleted as soon as consent is withdrawn by you.
Date of birth and / or age	Your date of birth or age.	Ensuring that you are eligible to apply for the treatment or service; Identification of your personal medical record	Data about your age or date of birth will be stored for up to seven years after your last appointment, unless we are legally obliged to keep them for longer.
Information necessary for the purposes of submitting an order for prescription products application or prescribed medication and directions for use. (We understand that the data collected is Sensitive Personal Data)	Your name and full postal address. (NB:Age and date of birth are not provided as this clinic does not treat children)	As legally required and as advised by the Department of Health	Data about your prescriptions, the delivery and storage of medicines including lot numbers and use by dates will be stored for up to seven years after your last appointment, unless we are legally obliged to keep them for longer.

Your medical history	Details of your medical history are provided by you at consultation and regularly updated.	Patient Safety	Data about your medical history will be stored for up to seven years after your last appointment, unless we are legally obliged to keep them for longer.
Information concerning the treatment or product(s) used	The date(s) when you were treated /or obtained the product(s) and how they were administered and by whom (Practitioner)	Providing you with a Medical treatment, product or service in accordance to our legal obligations and patient safety	Data about your medical history will be stored for up to seven years after your last appointment, unless we are legally obliged to keep them for longer.

2. What are the legal grounds we rely on to process your data?

We can only use your personal information where it falls into one or more categories. Lumley Aesthetics LLP relies on a few different legal grounds to process your data:

- It is necessary to the fulfilment of a contract we have with you;
- We have a legal or regulatory obligation to do so;
- It is in the patient's interest;
- You have provided your consent to the processing.

If you choose not to consent to us recording this information you can contact us at any time to request us to stop processing or erase your data relating to your condition or difficult circumstances. If you do not do so we will delete this information as soon as the regulatory time period for holding medical records has expired.

Lumley Aesthetics LLP will store this data, until you withdraw your consent.

3. How do we use the information?

3.1 We shall use the data and information you give to us: (a) to allow you to create an account; (b) to process and analyse your order(s) including dispensing and dispatching the products; (c) to keep and maintain our internal business records; (d) for our internal training purposes; (e) if you give us express consent, to provide you with our own tailored marketing information that we think may suit your interests and needs.

3.2 We reserve the right to add to the list of uses in clause 3.1. We shall not use pre-collected data and information for any new uses of your data without consulting you and obtaining your express consent if we are required to do so under the Regulations.

3.3 Where you provide us with information for the purposes of account registration and orders described above, We may use such information provided in order to verify the information provided, process your application and order.

3.4 We reserve the right to anonymise your data to obtain analysis while retaining your privacy.

4. How do we handle your information?

4.1 The data and information that we collect from you will be securely stored at our clinic premises: Lumley Aesthetics LLP, 5, Pound Lane, Sevenoaks, Kent TN13 3TB

4.2 We are committed to ensuring that your data and information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and other security procedures to safeguard and secure the information we collect, including: (a) all data and information you provide to us is stored within a secured system on a non-networked computer; (b) any hand written notes are secured in a locked cabinet within a locked and alarmed treatment room; (c) any digital payment transactions will be undertaken on a hardwired phone line and encrypted; (d) secure erasing of information, and destruction of any copies kept.

4.3 Any Sensitive Personal Data that we collect shall be processed in accordance with the Regulations, and only to permit us to process your request or enquiry. Your Sensitive Personal Data will be stored securely and will not be passed on to third parties.

5. To whom may we disclose your information?

5.1 In providing us with data and information, you agree that We may disclose such information, where necessary for the purposes and uses listed in clause 5, to: (a) Our employees, or agents representatives; (b) selected third parties including: business partners, suppliers and sub-contractors for the performance of any contract we enter into with you; (c) any other third parties we are legally obliged to disclose your information to.

5.2 We will only disclose your Personal Data to parties who bear sufficient legal responsibility for its protection and who have sufficient privacy and security measures in place to reasonably ensure that it will be protected and handled appropriately.

5.3 We may disclose your Personal Data to third parties: (a) in the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets; (b) if our assets, or substantially all of our assets are acquired by any third parties, in which case personal data held by it about our patients will be one of the transferred assets; (c) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use; or to protect our rights, property or safety of our patients or others.

6. Safeguarding your personal data

We take the protection of personal data very seriously and we will maintain appropriate safeguards to ensure the security, integrity and privacy of your information. We restrict access to your personal data to those business partners and service suppliers who need to know that information to provide products or services to you. Those persons are also subject to a duty of confidentiality

7. How long do we hold your information for?

We will retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of any legal, accounting or reporting requirements.

Whilst you continue to be our patient, we will keep a record of your personal information to ensure that we provide you with the best service possible and where we are required to keep your personal information to meet our legal and regulatory obligations. Please view the column 'How long we store it for' in the table in Section 1 to find out how long we hold specific sets of personal data for.

We will delete your personal data or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, or when you request their deletion, unless we are required by law to keep the information for a longer period.

8. Your legal rights

Subject to applicable law, you have the right to:

1. Access your personal data, rectify it, restrict or object to its processing, or request its deletion: -

a) Access to your data

You may request access to your personal data (commonly known as a 'data subject access request'), to update and correct inaccuracies in your personal data, to have the information anonymised or deleted, as appropriate. This enables you to receive a copy of the personal data we hold and to check that we are lawfully processing it.

b) Objection to processing

You have the right to lodge an objection about the processing of your personal data by us.

c) Restriction to processing your data

You have the right to request restriction of processing your data. We can restrict the processing of specific data items in situations where you believe that the data we hold about you is inaccurate, for example when you have moved house and we still hold your previous residential address.

In some circumstances, you can ask us to restrict how we use your personal data. Your rights are set out at Article 18 of the General Data Protection Regulations

d) Rectification of personal data

1. In some instances, we might hold outdated information about you like a mobile telephone number that you no longer use. You have the right to ask us to change this information.

2. Request transfer of your personal data to you or a third party.
3. Withdraw consent at any time where we are relying on consent to process your personal data at any time and free of charge.
4. Right to lodge a complaint with your supervisory authority.

9. Updates to this privacy notice

We may update this notice from time to time by publishing a new version on our website. We will endeavour to contact you regarding changes to this privacy notice, where possible and appropriate. However, you may also wish to check this page occasionally to ensure you are up to date and/or aware of any changes to this Privacy Notice.

10. How to contact us, complain or request access to your personal data

For general personal data enquiries, please contact:

Dr Cheralyn Lumley LDS.RCS.Eng, or, **Julian Lumley**

Lumley Aesthetics LLP. 5 Pound Lane, Sevenoaks, Kent TN13 3TB

To make a request by email: cheralyn@lumleyaesthetics.com

To make a request by post: Dr Cheralyn Lumley LDS.RCS.Eng Medical Director, Lumley Aesthetics LLP.

5 Pound Lane, Sevenoaks, Kent TN13 3TB

Please let us know if you have any feedback. You can contact us using the above contact details.

You also have the right to complain to the Information Commissioner's Office ("ICO"), the UK Supervisory authority for data protection issues at <https://ico.org.uk/concerns/>. However, we would appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance.