



THE  
WALCOTE  
PRACTICE  
WINCHESTER'S PRIVATE GP

## Fair Processing Notice – Testimonial Provider Data

When Walcote Health Ltd processes your personal data we are required to comply with “**Data Protection Legislation**”, including the General Data Protection Regulation 2016 (“**GDPR**”) and the Data Protection Act 2018.

Your personal data in this context includes all the information we hold that identifies you or is about you when you provide a testimonial. This includes, but is not limited to, your name, date of birth, age, email address, location data and possibly some medical or health information if this is mentioned by you in your testimonial. The personal data that we process may in some cases include your opinions, as well as special categories of data including but not limited to your gender and medical and health information.

Everything we do with your personal data counts as processing it, including collecting, storing, amending, transferring and deleting it. We are therefore required to comply with the Data Protection Legislation to make sure that your information is properly protected and used appropriately.

This fair processing notice provides information about the personal data we process, why we process it and how we process it.

### **Our responsibilities**

Walcote Health Ltd is the data controller of the personal data you provide. We have appointed a Privacy Officer who has day to day responsibility for ensuring that we comply with the Data Protection Legislation and for dealing with any requests we receive from individuals exercising their rights under the Data Protection Legislation.

### **Why do we process your personal data?**

When you provide a testimonial, we will receive and process your personal data. We may need this personal data from you on the grounds of legitimate interests as if we do not receive the personal data from you we may be unable to fulfil our obligations to other potential clients.

Wherever possible, we will anonymise this data as soon as possible, making your original personal data impossible to view. Your anonymised testimonial comments will be retained indefinitely in order to enable other potential clients to make an informed decision about utilising the services of Walcote Health Ltd, based on your opinion of the services we provide.

Your anonymised testimonial comments may be made publicly available on The Walcote Practice website, in Walcote Health Ltd marketing materials or they may be used for promotional purposes. You have the right to request that your testimonial comments be removed from the website or from future publications of marketing/promotional materials, even if anonymised. This will not affect the lawfulness of any processing we carried out prior to you requesting that your testimonial comments be removed.

You may provide explicit consent for Walcote Health Ltd to use your name and/or other personal data alongside your testimonial comments on The Walcote Practice website, in our marketing materials or for promotional purposes. If we obtain consent from you to the processing of your personal data, you can withdraw your consent at any time. You have the right to request that your testimonial comments be removed from the website or from future publications of marketing/promotional materials. This will not affect the lawfulness of any processing we carried out prior to you withdrawing your consent.

### **Who will receive your personal data?**

Wherever possible, your testimonial comments will be anonymised as soon as possible, making your original personal data impossible to view before use on the website or in marketing/promotional materials. If required, we may share the personal information from your testimonial with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act

2006. If required, we may share your personal information from your testimonial, or any cookie data from your use of our website, with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you
- Analytics and search engine providers that assist us in the improvement and optimisation of the website

Please note we may need to disclose your personal information where we:

- Sell any or all of our business or assets or we buy another business or assets in which case we may disclose your personal data to the prospective buyer or seller
- Are under a legal duty to comply with any legal obligation or to enforce or apply our terms and conditions; or
- Need to disclose it to protect our rights, property or the safety of our customers or others, including the exchange of information with other companies, organisations and/or governmental bodies for the purposes of fraud protection and credit risk reduction

Only with your explicit consent will the personal data that you provide with a testimonial be made publicly available alongside your testimonial comments on The Walcote Practice website and in our marketing/promotional materials.

### **How long will we keep your personal data?**

Wherever possible, we will anonymise your testimonial comments as soon as possible except in events such as those described above or alternatively if you have given explicit consent for WHL to publish some of your personal data alongside your testimonial comments in which case we will retain your personal data indefinitely. If we are required to obtain your consent to process your personal data, any information we use for this purpose will be kept until you withdraw your consent, unless we are entitled to retain the personal data on the basis of other grounds set out in the Data Protection Legislation.

### **What are your rights?**

You benefit from a number of rights with respect to the personal data we hold about you. We have summarised the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner's Office website (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>). These rights apply for the period in which we process your data.

#### **1. Access to your data**

You have the right to ask us to confirm that we process your personal data, as well as having the right to request access to/copies of your personal data. You can also ask us to provide a range of information, although most of that information corresponds to the information set out in this fair processing notice.

We will provide the information free of charge unless your request is manifestly unfounded or excessive or repetitive, in which case we are entitled to charge a reasonable fee. We may also charge you if you request more than one copy of the same information.

We will aim to provide the information you request as soon as possible and in any event within one month of having received your request, or any further information we require from you in order to process your request, however please be aware that there may be exceptions to this timescale. If we need more information to comply with your request, we will let you know.

#### **2. Rectification of your data**

If you believe personal data we hold about you is inaccurate or incomplete, you can ask us to rectify that information. We will comply with your request within one month of receiving it unless we do not feel that it is appropriate, in which case we will let you know why. We will also let you know if we need more time to comply with your request.

### **3. Right to be forgotten**

In some circumstances, you have the right to ask us to delete personal data that we hold about you. This right is available to you:

- Where we no longer need your personal data for the purpose for which we collected it
- Where we have collected your personal data on the grounds of consent and you withdraw that consent
- Where you object to the processing and we do not have any overriding legitimate interests to continue processing the data
- Where we have unlawfully processed your personal data (i.e. we have failed to comply with GDPR); and
- Where the personal data has to be deleted to comply with a legal obligation

There are certain scenarios in which we are entitled to refuse to comply with a request. If any of those apply, we will let you know.

### **4. Right to restrict processing**

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data but we do not have to delete it. This right is available to you:

- If you believe that the personal data we hold is inaccurate – we will cease processing it until we can verify its accuracy
- If you have objected to us processing the data – we will cease processing it until we have determined whether our legitimate interests override your objection
- If the processing is unlawful; or
- If we no longer need the data but you would like us to keep it because you need it to establish, exercise or defend a legal claim

### **5. Data portability**

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller. This right only applies to personal data you provide to us:

- Where processing is based on your consent or for performance of a contract (i.e. the right does not apply if we process your personal data on the grounds of legitimate interests); and
- Where we carry out the processing by automated means

We will respond to your request as soon as possible and in any event within one month from the date we receive it. If we need more time, we will let you know.

### **6. Right to object**

You are entitled to object to us processing your personal data:

- If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority
- For direct marketing purposes (including profiling); and/or
- For the purposes of scientific or historical research and statistics

In order to object, you must have grounds for doing so based on your particular situation. We will stop processing your data unless we can demonstrate that there are compelling legitimate grounds which override your interests, rights and freedoms or the processing is for the establishment, exercise or defence of legal claims.

## **Automated decision making**

Automated decision making means making a decision solely by automated means without any human involvement. This would include, for example, an online credit reference check that makes a decision based on information you input without any human involvement. We do not carry out any automated decision making using your personal data.

## **Your right to complain about our processing**

If you think we have processed your personal data unlawfully or that we have not complied with GDPR, you can report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("**ICO**"). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website - <https://ico.org.uk/concerns/>.

## **Any questions?**

If you have any questions or would like more information about the ways in which we process your data, please phone 01962 828715, email [info@thewalcoteppractice.co.uk](mailto:info@thewalcoteppractice.co.uk) or write to:

Privacy Officer  
Walcote Health Ltd  
Southgate Chambers  
37-39 Southgate Street  
Winchester  
Hampshire  
SO23 9EH