

PRACTICE PRIVACY STATEMENT – CARLOW DENTAL CENTRE (CDC) LTD.

We seek your consent to obtain and process personal data for the purpose of providing you / your child with dental treatment safely and to the highest standards. This Statement is your guide to the principles of privacy and confidentiality which govern the collection, use, storage, disclosure and destruction of your personal data in this practice.

The *Data Protection Compliance Officer* in this practice is **Petra Polonkai (practice manager)**.

Obtaining personal information

It is important to obtain, use and store information about you, your general and your dental health in order to provide dental care efficiently and reduce the risk of injury or other damage to your health. This personal data includes:

- Personal details such as your / your child's name, age, address, telephone numbers, email address
- Your / your child's doctor and relevant medical consultant(s)
- Your / your child's medical and dental history
- X-rays, CBCT scans (if applicable), clinical photographs, and digital scans and / or study models
- Information about proposed treatment, options, consent to treatment, treatment provided and its cost
- Notes of conversations or incidents that might occur for which a record needs to be kept
- Any correspondence with other healthcare professionals relating to you including agreed referrals to other healthcare professionals

Your / your child's personal information is stored on computer.

This practice is registered with the Data Protection Commissioner.

We will regularly update your / your child's personal data, including your / your child's medical care, to keep it relevant. We ask that you please inform us of any significant changes, such as a change of address or other contact details, at your earliest convenience. It is important to know that the collection, use or possible disclosure of this data may be crucial to our ability to safely provide you / your child with the care you require; without your agreement to this process it may not be possible to undertake treatment.

You have access to a copy of your / your child's personal data upon written request and the right to have data rectified if incorrect.

Personal data is kept for specified, explicit and lawful purposes

Your / your child's personal data is obtained, kept and used primarily for the purpose of providing you / your child with healthcare efficiently and safely at all times.

Staff within the practice will have access to the data on a 'need-to-know' basis to ensure you / your child receive(s) the highest standard of care. In the course of your / your child's care, members of the dental team may access your records:

- To prepare for and to complete your / your child's dental care
- To identify and print a prescription
- To generate a work certificate
- To type, if dictated or print a referral letter to another healthcare professional
- To open correspondence or any other documents from other healthcare professionals

- To print or photocopy your / your child's records if you instruct us to forward them to another healthcare professional
- To collate, print, photocopy and post insurance or medico-legal reports.

It is practice policy to send you a reminder / call of when your next 'check-up' is due. This reminder is sent to you by phone or text. We seek your consent to use your personal data for this propose and advise you of your right to refuse to have your data used for this purpose.

Personal data is only used and disclosed for the purpose of your care

All members of the dental team adhere to the practice's Code on Confidentiality in compliance with the *Data Protection Acts, 1988 and 2003*, and the Dental Council's *Code of Practice relating to Professional Behaviour and Ethical Conduct, 2012*.

Any disclosure of personal data, without your consent, can only be done for specified, legitimate reasons (*8 (a-h), Data Protection Act, 1988; Section 10, Dental Council's Code of Practice relating to Professional Behaviour and Ethical Conduct, 2012*).

Access to your personal data is on a 'need-to-know' basis. This prohibits the release of your / your child's information to a spouse, partner or family member without your explicit consent. A guardian or carer may have the right to access information in the case of vulnerable adults or those with diminished mental capacity. A parent or guardian will have access to your personal information if you are less than 16 years of age.

A copy of your dental records will be transferred to another practice or healthcare professional upon your written request.

Your consent will be sought before the release of any data to other healthcare professionals and then only the relevant part of your records will be released. All healthcare professionals are required to treat your personal data to the same standard of privacy as outlined in this statement.

Your consent will be sought in the case of:

- A report to dental insurance company
- A medico-legal report
- Any documentation relating to a "third party" Dental Scheme (e.g. Garda Medical Aid, etc.)

There are certain activities where patient information may be used but where the information is anonymised, eliminating patient identification (but with your written consent only):

- Teaching
- Continuing Professional Development. Case studies are a very useful learning tool
- Quality Assurance/Internal audit. Audit is a necessary tool in assessing and assuring the quality of your care
- Research

If any dentists of the Carlow Dental Centre should cease practice or should die while still a practicing dentist, the dental team will be guided by the *Dental Council's Code of Practice relating to Professional Behaviour and Ethical Conduct* in informing you, safeguarding your / your child's personal data and ensuring continuity of care where possible.

Every effort is made to ensure disclosed personal data is accurate and transferred securely.

Personal data is kept safely

Obtained personal data is accessed on a 'need-to-know' basis and thereafter, is stored securely:

- There is no access for unauthorised persons to manual records, computers or computer monitors within the practice.
- The dental team is trained in the secure use of email and the internet
- The dental team is compliant with the practice's security measures
- Manual records are stored under lock and key
- The practice premises is locked and alarmed when unoccupied
- The practice software is legally owned
- The practice software is updated regularly and password protected
- Software security is audited
- All clinical, financial and administrative records are backed up off-site daily by iPing Computer Services.
- A contract for the security of off-site records is in place between Carlow Dental Centre (CDC) Ltd and iPing Computer Services.

Ms Petra Polonkai is responsible for dealing with any incident where personal data has been put at risk of unauthorised disclosure, loss, destruction or alteration. Management of any breach incident will comply with the advice of the Data Protection Commissioner (Personal Data Security Breach Code of Practice).

Personal data is kept accurate, complete and up-to-date

A staff member will review your / your child's personal information with you on a regular basis to ensure we hold accurate, high quality records for you. Any changes to your / your child's personal details, your / your child's medical or dental status will be recorded in your / your child's records. We ask you to let us know of any changes in contact details at your earliest convenience.

Personal data is adequate, relevant and not excessive

Every effort is made to ensure that the information we collect and retain for you / your child is in keeping with our aim to provide you / your child with an efficient service and to care for you / your child safely. We will explain the purpose of any information sought if you are not sure why.

Personal data is retained for no longer than necessary

We retain all adult records for 8 years after the last treatment. In the case of children and young adults, the records are kept until the patient's 25th birthday; or their 26th birthday if the young person was 17 when they finished treatment. If a patient dies before their 18th birthday, records are kept for 8 years.

All records are disposed by a secure, certified, method of destruction (*Dental Council Code of Practice relating to Professional Behaviour and Ethical Conduct, 2012*).

Your rights

You are legally entitled to a photocopy of your personal data upon written request. As well as a right of access you also have the right to have any inaccuracies in your / your child's data rectified and to have the data erased. You will be provided with a digital copy of an x-ray in response to an access request.

All written requests should be addressed to:

Petra Polonkai (Practice Manager)

**CARLOW DENTAL CENTRE, UNIT 9, GRAIGUE VILLAGE CENTRE, GRAIGUECULLEN,
CARLOW, CO. CARLOW**

Your request will be dealt with in a timely manner.

It is your right to have your / your child's name removed from all practice marketing information including 'check-up' recalls if you do not consider this information to be in your best interest. If you wish to be removed from our appointment texting service or our marketing/ mailing lists please advise **Petra Polonkai**.

If you do not wish to have your / your child's personal data collected, used or disclosed as described in this Statement please discuss this matter with **Petra Polonkai**. It is important to know that the collection, use or possible disclosure of this data may be crucial to our ability to safely provide you / your child with the care you require; without your agreement to this process it may not be possible to undertake treatment.

If you have a complaint or concern with any aspect of how we process your / your child's personal information we would hope that you would notify **Petra Polonkai** in the first place. You retain the right to make a complaint to the Data Protection Commissioner at all times.

If you have any questions in relation to this Statement or any issue that arises from it please speak with **Petra Polonkai**.

PETRA POLONKAI

Data Protection Compliance Officer