



The Croft Clinic

Data Privacy Policy – External

When THE CROFT CLINIC LTD processes your personal data, it is required to comply with the Data Protection Act 2018 (“DPA”) and the UK GDPR (together referred to as the “Data Protection Legislation”).

Your personal data includes all the information we hold that identifies you or is about you, such as your name, email address, postal address, date of birth, location data, and, in some cases, opinions we document about you. It also includes special categories of data like medical and health records, care plans, and information about your religious beliefs, ethnic origin, sexual orientation, and political views.

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

This data privacy policy provides information about the personal data we process, why we process it, and how we process it.

Our Responsibilities

THE CROFT CLINIC LTD is the data controller of the personal data you provide. We have appointed Gina Monk as our Data Protection Officer, responsible for ensuring compliance with the Data Protection Legislation and handling any requests from individuals exercising their rights under the legislation.

What Personal Data Do We Process About You?

We process your personal data to provide you with the services you requested, fulfil our contract with you, and receive services or goods from you. We may also process your data to respond to your queries or comments and correspond with you daily.

We may need personal data from you to provide services, meet legal obligations, enter into a contract, and provide necessary information. If we do not receive the required data, we may be unable to fulfil our obligations to you.

Service Users: Personal data we may process includes:

- Identity data: first name, middle names, last name, marital status, title, date of birth, gender
- Contact data: address, email address, telephone numbers
- Financial data: bank account, payment card details
- Special categories of data: medical background, health information, race, and ethnicity



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We process your information based on your consent, legitimate interests, contract performance, vital interests' protection, or health and social care service provision.

Suppliers: Personal data we may process includes:

- Identity data: first name, middle names, last name, marital status, title, date of birth, gender
- Contact data: billing and delivery addresses, email address, telephone numbers
- Financial data: bank account, payment card details (if personal, not company data)
- Transaction data: payment details to you (if you are an individual)

We process your information based on legitimate interests (business relationship) and contract fulfilment (if you are an individual).

Candidates: Personal data we are likely to process includes:

- Identity data: first name, middle names, last name, marital status, title, date of birth, gender
- Contact data: postal address, email address, telephone numbers
- Background data: education, career background, work experience
- Personal information: skills and qualities
- Information in CVs, applications, or covering letters (including special categories of data provided by consent)

We process your information based on legitimate interests to determine suitable vacancies. Consent can be withdrawn at any time without affecting prior processing.

Transcription and Clinical Documentation: To support accurate and efficient record-keeping, we use transcription and clinical documentation services. Currently, we use Heidi AI to transcribe clinical appointments. From 2026, we will be piloting a new platform, Neuro Type, which includes the secure upload of patient records and transcripts to their system.

These services process your data on our behalf and are contractually required to comply with UK GDPR and the Data Protection Act 2018. You may withdraw your consent to transcription or data sharing at any time. In such cases, we will discuss alternative arrangements and any implications for service delivery.

Who Will Receive Your Personal Data?

Although the UK is no longer part of the EU, we still comply with the following: We only transfer your personal data as needed. Recipients include:



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- The Croft Clinic
- Your GP Practice
- Local Authority
- Health and Social Care Services (associated with your care)
- Educational bodies (such as schools)
- Approved transcription and clinical documentation providers (e.g., Heidi AI, Neuro Type)

We do not transfer your personal data outside of the EEA.

How Long Will We Keep Your Personal Data?

We will retain your personal data for the legally required period. Adult records are kept for an average of 8 years, while child records are kept until their 26th birthday. Further details on retention periods can be found at: Records Management Code of Practice. Your information will be securely stored at all times. After the retention period, your files and personal data will be permanently deleted or destroyed.

What Are Your Rights?

You have several rights concerning your personal data. Depending on the processing grounds, these rights may include:

1. Access to Your Data:

- You can request confirmation and access to your personal data and related information. We provide this free of charge unless the request is unfounded, excessive, or repetitive, in which case a reasonable fee may apply. We respond within one month of receiving the request.

2. Rectification of Your Data:

- If you believe your personal data is inaccurate or incomplete, you can ask us to rectify it. We will comply within one month, unless inappropriate, in which case we will explain why.

3. Right to Be Forgotten:

- You can request deletion of your personal data under certain circumstances, such as no longer needed for its original purpose, withdrawal of consent, or unlawful processing.

4. Right to Restrict Processing:



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- You can ask us to suppress processing of your personal data in specific scenarios, such as disputing its accuracy or objecting to processing.

5. Data Portability:

- You can request your personal data in a structured, commonly used, machine-readable format to transmit to another data controller. This applies to data provided by consent or contract performance and processed by automated means.

More information on your rights is available from the Information Commissioner's Office website: [ICO - Individual Rights](#).

6. Right to Object

You have the right to object to our processing of your personal data if:

- The processing is based on legitimate interests, performance of a task in the public interest, or the exercise of official authority.
- It is for direct marketing purposes (including profiling).
- It is for scientific or historical research and statistics.

To object, you must have grounds based on your particular situation. We will stop processing your data unless we can demonstrate compelling, legitimate grounds that override your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defence of legal claims.

Automated Decision-Making

Automated decision-making involves making a decision solely by automated means without any human involvement. For example, an online credit reference check that makes a decision based on the information you input without human involvement, or an automated clocking-in system that issues a warning if a person is late a certain number of times without HR input. We do not carry out any automated decision-making using your personal data.

Right to Complain About Our Processing

If you believe we have processed your personal data unlawfully or not complied with UK GDPR, you can report your concerns to the supervisory authority in your jurisdiction. In the UK, this is the Information Commissioner's Office (ICO). You can contact the ICO by calling 0303 123 1113 or via other means as set out on the ICO website.

Any Questions? If you have any questions or would like more information about how we process your data, please contact Gina Monk, Practice Manager, at g.monk@thecroftclinic.com.

Privacy Policy 2025.1

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