

TABLE 1	Patients		General Public (e.g. making enquiries)	
	Personal Data	Special Category Data	Personal Data	Special Category Data
<b>Data collected</b>	<p>Clinical record (personal data component) (see note 3),</p> <p>Email or SMS correspondence and call records of phone calls with you relating to administration of appointments,</p> <p>Accounting data (payments, receipts)</p>	<p>Clinical records (special category data component) (see note 3) including email or SMS correspondence with you relating to provision of healthcare</p>	<p>Contact details (including your name, email, phone and address),</p> <p>Email or SMS correspondence and call records of phone calls with you</p>	<p>Health information contained in email or SMS correspondence with you</p>
<b>Purposes and legal bases for processing</b>	<p>We may contact you in order to manage the provision of your healthcare [<i>Contract, Article 6(1)(b)</i>]</p> <p>We are obliged by our regulatory body (GOsC) to keep your contact details as part of your clinical record, and by HMRC to keep accounts of fees paid [<i>Legal obligation, Article 6(1)(c)</i>]</p>	<p>We keep clinical records because we are obliged to do so by our regulatory body (GOsC), in order to provide you with healthcare, as a legal record, and where appropriate to help in emergency situations where you are incapacitated, or where we are obliged to inform the local authorities of a public health risk</p> <p>[<i>Legal obligation, Article 6(1)(c), Vital interests, Article 6(1)(d), Public task, Article 6(1)(e), Vital interests of incapacitated person, Article 9(2)(c), Legal claims, Article 9(2)(f), Provision of healthcare, Article 9(2)(h), Public health, Article 9(2)(i)</i>]</p>	<p>We may respond to your enquiry to let you know if Osteopathic treatment from us may be suitable for you, and if so, to arrange your first appointment</p> <p>[<i>Contract, Article 6(1)(b), and in addition, for special category data, Provision of healthcare, Article 9(2)(h)</i>]</p>	
<b>Data source</b>	Direct from you	Direct from you, Notes taken by your Osteopath	Direct from you	
<b>Data record types</b>	Digital data, Paper records	Digital data, Paper records	Digital data	Digital data

Data Subject	Patients		General Public (e.g. making enquiries)	
	Personal Data (non-special category data)	Special Category Data	Personal Data (non-special category data)	Special Category Data
<b>Data processors</b>	Data Controller, Email and phone service providers		Data Controller, Email and phone service providers	
<b>Retention method</b>	Filing cabinet, GDPR compliant email service		GDPR compliant email service	
<b>Security</b>	Lock and key (filing cabinet), Password protected email accounts and devices		Password protected email accounts and devices	
<b>Retention period</b>	Accounting data - indefinitely,  Clinical records may be retained indefinitely, and in line with advice of regulatory body (GOsC): Adults - for a minimum of 8 years after treatment has ended, Children - at least until age of 25  Email relating to administration of appointments - indefinitely	Clinical records may be retained indefinitely, and in line with advice of regulatory body (GOsC): Adults - for a minimum of 8 years after treatment has ended, Children - at least until age of 25	Until request for erasure	
<b>Erasure</b>	Exempt from right to erasure under  Legal obligation <i>Article 17(3)(b)</i> - Clinical records and financial data,  Legal claims <i>Article 17(3)(e)</i> - Email relating to administration of appointments	Exempt from right to erasure under Legal obligation <i>Article 17(3)(b)</i> , Public Health <i>Article 17(3)(c)</i> , and Legal claims <i>Article 17(3)(e)</i> .	On request	
<b>Data deletion</b>	Digital data - software deletion Paper records - shredding		Software deletion	

## Notes

1. "Article" means article of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (General Data Protection Regulation).
2. GOsC is the General Osteopathic Council, the UK regulatory body for Osteopathy.
3. For each data subject, the data in the Clinical records can be categorised into two components:
  - personal (non-special category) data component- including your name and contact details (address, phone number, email),
  - special category data component - including medical history and records of treatment.