Data protection privacy notice for patients

In providing your dental care and treatment, we collect information about you and your health. Some information comes directly from you; other information is provided by your treating dentist, referring professionals, hospitals or other healthcare providers.

This notice explains how Real Good Dental uses patient information, including information obtained from other people or organisations. It provides privacy information under Articles 13 and 14 of the UK GDPR and, where applicable to our Irish practices, the EU GDPR.

Who is responsible for your information

Real Good Dental (RGD) is the controller responsible for patient records held and managed by its dental practices. Our central correspondence address is 25 Queen Street, Edinburgh, EH2 1JX. This notice is intended for patients attending RGD practices in the United Kingdom and Ireland.

Our Data Protection Officer is The Privacy Worx Ltd. You can contact the DPO at dpo@theprivacyworx.com or contact your dental practice directly.

Self-employed and associate dentists providing care at our practices may also have responsibilities as independent data controllers for information they use for their own professional and clinical obligations. RGD remains responsible for its practice-held records. The precise responsibilities depend on the circumstances; being a self-employed dentist does not, by itself, make the dentist a data processor or a joint controller.

Information that we hold

Contact details and administration

Your name, date of birth, address, contact details, emergency contact or parent/guardian details (where relevant), appointment history, registration information and communications about your care.

Dental and medical records

Clinical records and health information, including:

- Medical and dental histories, diagnoses, assessments and treatment notes.
- Radiographs, clinical photographs, scans, study models, laboratory prescriptions and results.
- Treatment plans, consent records, prescriptions, referrals and correspondence with other healthcare professionals.
- Information relating to complaints, incidents and the quality or safety of your treatment.

Financial information

Fees, invoices, payments, dental plan or insurance details and information needed to manage your account. We do not normally need to retain full payment-card details after a transaction.

Where your information comes from

We normally obtain registration details, medical histories, contact details and payment information directly from you, or from a parent or authorised representative. We also obtain or create information through your appointments and treatment.

Where information is not collected directly from you, the sources may include:

- Your treating dentist, including a self-employed or associate dentist who records findings, treatment or professional correspondence in the practice record.
- A referring dentist, GP, hospital, specialist, orthodontic service or other healthcare provider involved in your treatment.
- Dental laboratories, diagnostic providers, insurers or dental schemes in connection with your care or account.
- A parent, guardian, attorney or other authorised representative, where appropriate.

The categories of information received from these sources can include clinical findings, treatment history, radiographs, referral details, medical information, contact details, consent information and relevant account information. We do not routinely collect patient information from publicly accessible sources.

Where an independent treating dentist provides clinical information to the RGD practice record, that dentist is a source of information for the purposes of Article 14. This notice explains how RGD then uses that information. We make this notice available when patients register or first engage with the practice and, where applicable, when information is obtained from other sources, in accordance with the statutory timing requirements.

How we use your information

We use your information only where there is a lawful reason to do so. Depending on the purpose, we rely on the following grounds under Article 6 of the relevant GDPR:

- Care and appointments: to arrange and deliver dental services, manage your treatment and account (Article 6(1)(b), where processing is necessary for our contract with you, and/or Article 6(1)(f), where appropriate).
- Clinical records, safeguarding, professional and regulatory requirements: to comply with legal obligations (Article 6(1)(c)) or to protect vital interests where necessary (Article 6(1)(d)).
- Quality, service improvement and complaints: our legitimate interests in safe and effective care, investigating concerns and managing the practice (Article 6(1)(f)); or legal obligations where applicable (Article 6(1)(c)).
- Billing, debt recovery and legal claims: contract, legal obligation and/or legitimate interests, as applicable (Articles 6(1)(b), (c) or (f)).
- Optional marketing or research: consent (Article 6(1)(a)) where required, or legitimate interests where the law permits and your rights are respected (Article 6(1)(f)).

Because dental and medical records contain sensitive health information, we also rely on Article 9(2)(h) where processing is necessary for diagnosis, healthcare or treatment, or management of healthcare services, subject to professional confidentiality and applicable domestic law. Where necessary, Article 9(2)(f) may apply to establishing, exercising or defending legal claims. We do not rely on consent as the general legal basis for ordinary clinical record keeping.

Appointment reminders and clinically relevant recall messages support your care. Promotional emails and text messages are different: we send them only where permitted under the UK Privacy and Electronic Communications Regulations or Irish ePrivacy rules, including consent or an applicable existing-customer exception. You can opt out of marketing at any time. We do not use clinical health information to target promotional marketing without a separate lawful justification.

We may ask for your consent to identifiable use of information for optional education or research activities. Where possible, we use anonymised information instead.

Sharing information

Access to your information is limited to people who need it to provide care, support the practice or meet legal responsibilities. Depending on the circumstances, we may share relevant information with:

- Treating dentists and other clinical professionals, including associate dentists; referring practices, hospitals, GPs and specialists.
- Dental laboratories, diagnostic services and dental plan or insurance providers.
- Companies providing practice-management systems, secure communication, IT hosting, archiving, payment processing and other services under appropriate data protection arrangements.
- Professional regulators, healthcare bodies, legal advisers, insurers, courts and public authorities where disclosure is lawful and necessary.
- Debt collection providers where there is an outstanding account and disclosure is lawful and proportionate.

A recipient may be an independent controller or a processor depending on its role. We share only information necessary for the relevant purpose, subject to confidentiality and appropriate security. We do not sell patient information.

Transfers outside the UK or Ireland

Our group and approved providers may process or access information across the United Kingdom and the European Economic Area (EEA). Transfers of personal data from the EEA to the UK are currently covered by the European Commission’s UK adequacy decision; UK transfers to the EEA are covered by UK adequacy regulations.

If a supplier or other recipient processes personal data in a country not covered by the relevant adequacy arrangement, we apply a lawful transfer mechanism where required, such as approved standard contractual clauses, the UK International Data Transfer Agreement or UK Addendum, together with any necessary assessment and safeguards. You can request information about the protections applying to your information by contacting our DPO.

How long we keep your information

Our usual RGD policy is to keep clinical records for at least 11 years after your last appointment, or, for a child, until the later of 11 years after the last appointment or their 25th birthday. Records may be held for longer where justified by applicable local legal or professional requirements, an ongoing complaint, a claim or a regulatory investigation. We periodically review retention and securely delete or anonymise information when it is no longer needed.

Other records, including financial information, enquiries, complaints and marketing preferences, are retained for periods appropriate to their purpose and applicable statutory, regulatory or limitation requirements. We can provide further information about the relevant retention period on request.

Access to your information and other rights

You have the right to request access to your personal data and a copy of it. You may also have the rights to request correction, erasure or restriction, to object to particular processing and, where applicable, to data portability. These rights are subject to conditions and legal exemptions; clinical records often cannot be erased where retention is required by law or professional obligations.

Where processing is based on consent, you may withdraw it at any time without affecting processing already carried out. You have an unconditional right to object to use of your personal data for direct marketing.

Please send requests to dpo@theprivacyworx.com or to your practice. We normally respond within one calendar month, subject to the applicable legal rules. A first copy of your personal data is generally provided without charge; a fee is only considered where the law permits it.

Data protection complaints and concerns

You have the right to complain directly to RGD about how we handle your personal information. You can complain through your practice (in person, by telephone or in writing), or email our DPO at dpo@theprivacyworx.com. For UK practices, this right is established by section 164A of the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

We will acknowledge a data protection complaint within 30 days, take appropriate steps to investigate it without undue delay, keep you informed and explain the outcome. This complaints process is also available to patients of our Irish practices. You may also complain to the relevant independent regulator:

- United Kingdom: Information Commissioner's Office (ICO), www.ico.org.uk, telephone 0303 123 1113.
- Republic of Ireland: Data Protection Commission (DPC), www.dataprotection.ie.

If you do not provide information

Some information is needed so that we can register you, assess your health, provide safe treatment, meet professional obligations and administer your account. If relevant information is not provided, we may be unable to provide some services safely or fulfil our obligations. Providing information for optional marketing or research is not a condition of treatment.

Automated decisions and changes to this notice

We do not use solely automated decisions, including profiling, to make decisions about dental treatment that produce legal or similarly significant effects on patients. If this changes, we will provide the information required by law. We keep this notice under review and will explain material changes where appropriate.

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