

# **Arcturus Clinic Ltd**



## **GDPR**

### **Policies and Procedures Document**

## Index

1. Purpose of the policy:
2. Definitions of key terms:
3. Principles and purposes of processing
4. Key requirements and controls:
5. Key roles and their responsibilities:
- 6 Appointment of Lead Supervisory Authority

### Appendix:

Online privacy statement  
Consent forms  
Contact details  
Data Protection Policy

- 1) Purpose of the policy

ARCTURUS CLINIC LTD respects the right to privacy of every individual who visits our clinic and website. This policy documents our internal procedures in relation to personal data relating to both staff and customers.

## 2) Definition of key terms

The following terms are referred to within our procedures document:

**Data subject** A data subject is a natural person. For ARCTURUS CLINIC LTD this is a patient, a retail customer or a member of staff.

**Personal data** Any information relating to an identified / identifiable individual, whether it relates to his or her private, professional, or public life. This could include a name, email address, medical information, IP address, or a combination of the data that directly or indirectly identifies the person.

### Sensitive personal data

The GDPR refers to sensitive personal data as “special categories of personal data.” The special categories of data include racial or ethnic origin, political opinions, religious or philosophical views, trade union membership, sexual orientation, and health, genetic and biometric data where processed to uniquely identify an individual. Personal data relating to criminal convictions and offences are not included, but similar extra safeguards apply to its processing. Health questionnaires for the patients plus some application form information will be treated as sensitive personal data.

**Data controller** ARCTURUS CLINIC LTD acts as the Data Controller

**Data processor** Reception team members and the manager plus the bookkeeper will all process data held by ARCTURUS CLINIC LTD

**DPO** ARCTURUS CLINIC LTD has appointed Dr Stephen Hopwood as it’s Data Protection Office. His role includes monitoring compliance to the procedures laid down in this manual as well as updating the manual.

**Accountability** We take our responsibilities seriously. We have a published privacy statement and review staff compliance .

**Consent** All patients are requested to give consent as part of the registration process to cover future direct marketing. This Consent is “freely given, specific, informed and unambiguous” .

**Privacy Impact Assessment (PIA)** Any specific risk will be identified as will the basis on which we are processing data.

**Processing** ARCTURUS CLINIC LTD will collate and store personal data digitally via the use of laptops and Onedrive.

**Access** Our online privacy statement confirms a data subject's right to request certain information relating to the processing of their personal data.

**Third party** We do not sell or pass on personal data to any other company for use by them. We may pass personal data to the police or a representative of the court if legally required to do so.

### 3) **Key requirements or controls:**

All staff who handle customer data have received the ARCTURUS CLINIC LTD guidelines for GDPR.

Staff have been trained in the policies and procedures laid down in this manual.

This part of the policy lists the key requirements that should be fulfilled in order to be considered compliant with the policy. To ensure that employees and managers can validate the fulfilment of a requirement, a set of controls can be provided. For example, to fulfil the requirements of lawful processing, a control should be implemented to ensure that all processing activities are listed and mapped to one of the legitimate purposes defined in the policy.

### 4) **Key roles and their responsibilities:**

Data Protection Office -Dr S Hopwood

Data Protection Management Team – Julie Harrison

Data Entry - Respond in a timely fashion to requests to unsubscribe from mailing lists.

Reception Control of patient form, contact and consent information

Personnel Staff information and payroll

### 5) **Appointment of Lead Supervisory Authority**

Dr S Hopwood is the person within ARCTURUS CLINIC LTD who is heading up the data protection compliance (referred to as the Lead Supervisory Authority).