

## Patient Privacy Notice - AB VISION LTD

### Who We Are

AB Vision Ltd trading as “**Allon Barsam**” (‘we’ or ‘us’ or ‘our’) gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data when you are using the company’s website

Our registered office is at 5 Technology Park, Colindeep Lane, Colindale, London, United Kingdom, NW9 6BX and we are a company registered in England and Wales under company number 09169244. We are registered on the Information Commissioner's Office Register; registration number ZA176100, and act as the data controller/data processor when processing your data. Our designated Appointed Person for your consent and privacy related queries, is **Cheryl Jones**, who can be contacted at AB Vision Ltd, 9 Mountview Lodge, Swiss Terrace, NW6 4RR. Tel No: 0808 133 2020.

### Information That We Collect

We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

*The personal data that we collect from you is: -*

- **Contact details:** including name, email, telephone number and physical address
- **Personal details:** including gender and date of birth
- **Medical eye data:** Specific eye history, including vision prescriptions and previous eye surgery. These are collected during your appointment with our consultant. [after becoming a patient to us] to provide your treatment plan.
- **Other health data:** General health conditions and allergies. These are collected to provide your treatment plan.
- **Payment or credit card information:** this is taken at the point of booking appointments. We use secure card processing terminal to process and we don’t keep your card details in our system
- **Personal preferences:** including your marketing and cookie preferences, IP addresses, referrer headers, data identifying your web browser and version, and web beacons and tags.
- When interacting with our Sites, data is automatically collected and shared with The Company by the technology platforms providing the experience. For example, your web browser or mobile device may share certain data with The Company as those devices interact with our Sites. More information about these practices is included in the Cookies and Pixel Tags section below.
- **Sensitive data:** including race and ethnicity. We collect this information as some eye conditions are more common in certain ethnicities such as Keratoconus; this data is taken at the stage of an individual becoming a patient.
- We may also ask you to complete surveys that we use for research and Marketing purposes, although you do not have to respond to them.

### **We collect information in the below ways: -**

Registration Form(paper), Website Contact form, Booking Form (Website) from your GP/Doctor(referral) and any notes from your consultation with the specialist during appointments & treatments.

### **How We Use Your Personal Data**

**AB Vision Ltd** takes your privacy very seriously and will never disclose, share your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below: -

- *We collect your personal data to provide service(s) related to your medical care (vision related) and to ensure that we provide relevant ongoing care*
- *We collect and store your personal data as part of our legal obligation to the General Medical Council, for business accounting and tax purposes*
- *We will occasionally send you marketing information where we have assessed that it is beneficial to your ongoing medical care. Such information will be non-intrusive and is processed on the grounds of legitimate interests*

### **Your Rights**

You have the right to access any personal information that we process about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. We use other processor(s) to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

### **Hospitals/Medical Centers**

We use external hospitals/medical centers to perform your surgeries or treatments [for example Focus Clinic, Platinum Medical Centre - The Wellington Hospital, Spire Bushey Hospital]. We share your information with them. They are obliged by the law to enter your personal and health related data onto their system, in order for us to provide you the relevant treatment and care at their facilities.

### **Wagada Digital Marketing**

We use Wagada Digital Marketing for our PR and marketing and they act in the capacity of a processor on our behalf. We may share some of your personal information [i.e. contact details] to meet business marketing requirements. They may contact you to get the feedback from you via Trustpilot or other surveys

For more information about Wagada Digital, and their privacy notice, please visit their website <https://www.wagada.co.uk/>

### **Trustpilot**

We use Trustpilot to gain your feedback independently about our services, and your experience with us. Trustpilot may process your personal data such as your name, address, telephone [not medical data] to obtain your feedback. Wagada Digital [Marketing Agency] will initiate this process.

For more information about Trustpilot and their privacy notice, please visit their website <https://uk.trustpilot.com/>

### **Money Penny Telephone Answering Services**

We use Money Penny to answer your calls and take messages while our admin team are busy or we are closed for business [out of office hours]. On behalf of AB Vision they are instructed to collect your personal details and pass on to us in order to process your queries effectively.

For more information about Money Penny, and their privacy notice, please visit their website <https://www.money Penny.com/uk/privacy/>

## **Omni Capital Retail Finance [OCRF]**

We use OCRF to provide you finance option for your treatment. We may share your contact details with them once you have chosen the finance option. We don't disclose any other data about yourself. They will gather all other information from you direct to make a decision on your finance application.

For more information about OCRF, please read their Privacy Notice at <http://www.omnicapitalretailfinance.co.uk/privacy-policy/>

## **Safeguarding Measures**

AB Vision Ltd takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We comply with UK data protection law and all the applicable medical confidentiality guidelines issued by professional bodies such as the General Medical Council. Your confidential medical information will only be disclosed to those involved with your treatment or care, or in accordance with UK law and guidelines from professional bodies.

We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: SSL, TLS encryptions when communicating between systems, pseudonymization (where it's possible), restricted access, IT authentication, firewalls, anti-virus/malware, Email encryption.

## **Consequences of Not Providing Your Data**

You are not obligated to provide your personal information to **AB Vision Ltd**, however, as this information is required for **us to provide you with our services**, we will not be able to offer all our services without it.

## **Data Minimisation and Data Retention**

We aim to never collect or store any information that is not required for the delivery of the services to which you subscribe. Any information that we do collect is and will always be explicitly accounted for in this Privacy policy. We will take reasonable steps to destroy or de-identify personal information we hold if it is no longer needed for the purposes set out above, or required for us to maintain a high level of care, in accordance with EU General Data Protection (GDPR) regulation and the ePrivacy regulation.

We retain your personal data for as long as we hold 'legitimate interests' to fulfil the purposes for which we collect it, until the interests cease to exist unless if otherwise required by law. For example we retain your medical records for minimum of 8 years.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

## **Special Categories Data**

**AB Vision Ltd** may need to process sensitive personal information (*known as special category data*) about you, to provide episodes of treatment and ongoing medical care. Where we collect such information, we will only request and process the minimum necessary for the specified purpose.

Where we rely on your consent for processing special category data, we will obtain your explicit consent. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

## **Lodging A Complaint**

**AB Vision Ltd** only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

## **Our Supervisory Authority**

Information Commissioner's Office  
Wycliffe House  
Water Lane,  
Wilmslow,  
Cheshire SK9 5AF  
Tel: 0303 123 1113  
[www.ico.org.uk](http://www.ico.org.uk)

This is for the physical form.....

### Marketing Consent

**AB Vision Ltd** would like to contact you with the information of new treatment or updated procedures that we provide. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting **AB Vision Ltd** directly [info@allonbarsam.com].

If you **consent** to us contacting you with the above-mentioned marketing and offers, please tick to say how you would like to be contacted: -

Post  Email  Telephone  Text Message (SMS)

### Consent

**AB Vision Ltd** take your privacy seriously and will only process your personal data with your consent and in accordance with the terms stated in our Privacy Notice. If you consent to us collecting and processing your personal data, please complete tick below: -

I **[insert data subject name]** consent to you processing my personal data as detailed in your Privacy Notice:

**NOTE:** We can also use double-opt in method whereby the data subject consents via tick box, then has to follow an email link to make sure that it is the correct person consenting – this double opt-in can also serve as evidence of the consent and must be retained.]