

Morrello Clinic

Experts in neuro-rehabilitation

www.morrello.co.uk

Privacy Policy

Morrello Health Limited is committed to ensuring your privacy is protected and taking appropriate care with your personal data as a valued client and user of our website.

This privacy notice provides information on how Morrello Health Limited, (herein after referred to in this policy as "Morrello Clinic", "we" or "us"), collects and uses personal data relating to users (referred to in this notice as "you") of the Morrello Clinic website, www.morrello.co.uk, and related services (together referred to in this policy as the "Services").

1. Who we are

Morrello Clinic is a company registered in England and Wales with company number 07110229.

Morrello Clinic acts as the data controller for the purposes of the Data Protection Act 1998 & 2018 and the EU General Data Protection Regulation ("GDPR") regarding the use of your personal data as described in this policy.

You can contact Morrello Clinic using the contact details set out in paragraph 9 below.

2. Data we collect about you

We may collect the following information that identifies you as an individual ('Personal Information') and non-personal information from you when you contact us or use our Services:

- identity and contact information such as name, age, email addresses, telephone numbers;
- demographic information such as postcode, preferences and interests;
- information pertinent to fulfilling our services on an individual's or organisation's behalf such as health and medical records;
- other information you provide to us in customer surveys, competitions and/or offers

We may also collect information about you from other sources. This may include the following:

- information you have shared publicly, including on social media

Any case studies, testimonials and images on our website have been obtained and names collected with the individual's consent. We will always seek consent before using any public material on our website.

It is important to note that from time to time our website contains links to third party websites and services. Please remember that when you use a link to go from our site to another website or you request a service from a third party, your browsing and interaction on any

other websites or your dealings with any other third-party service provider, is subject to that website or third-party's service provider's policy on privacy and data protection.

We do not monitor, control or endorse the privacy practices of any third parties and encourage you to become familiar with the privacy practices of every website you visit or third-party provider that you deal with and to contact them direction if you have any questions.

This policy applies solely to personal information collected by us through our Service and does not apply to third party websites and third-party service providers.

3. What we use this data for?

Our use of your personal data will always have a lawful basis. We collect information about you to manage your enquiry about our Services and, if you agree, to email you about marketing updates on the service we offer, new technologies, equipment and future events. Your enquiry will be dealt with by our Clinic Reception staff. Your personal details will be retained until your enquiry has been fulfilled and/or you are no longer a client with us.

You have the right to withdraw your consent to us using your personal data at any time. Please contact us on the contact details in paragraph 9 below if you wish to do so.

We only process your data if there is a legal basis for doing so. We rely on three legal bases for processing your data: -

1. your consent, which you can withdraw at any time;
2. our legitimate business interests; and
3. the proper management of a contract to which you are a party.

4. Disclosure of your personal data to third parties

Morrello Clinic may disclose your personal data for the purposes outlined in paragraph 3 above to selected third parties. These may include: -

- Physiotherapists
- Occupational Therapists
- Finance
- Administration
- Case Managers
- Solicitors
- GP's
- Consultants
- Rehabilitation Equipment suppliers
- Technology Providers and
- any other relevant Healthcare Professionals to keep them updated on your treatment with us

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:

- required by law, or to comply with judicial proceedings, court orders or legal or regulatory proceedings;
- necessary to protect the safety of our employees, our property or the public;
- necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction; or
- proportionate as part of a merger, business or asset sale

5. Storage and security of your personal data

Morrello Clinic respects your data and has taken appropriate measures to ensure we have mitigated against such risks as loss or unauthorised access, destruction, use, modification or disclosure of data.

Your personal data is stored in electronic and physical records, which are maintained by Morrello Clinic and/or our service providers.

We do not transfer any of your data outside of the EEA unless you are an international client. If you are an international client, personal data shall not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

By submitting your personal data, you agree that we may transfer, store or process your personal data. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy and applicable legislation as in place from time to time.

We will retain your personal data for as long as is necessary and to maintain the provision of our Services to you. We may also be bound by statutory obligations regarding time limits to retain certain types of information that we hold about you as set out below: -

Health Record Type	Minimum Retention Period
Client Records of Adults	8 years after conclusion of treatment or death
Client Records of Children	Until the client's 25th birthday or 26th if the young person was 17 at conclusion of treatment, or 8 years after death
Client Records Med Legal	External documentation is destroyed upon completion of case

6. Your rights

Under the GDPR, you have a number of rights regarding the personal data that we hold about you as follows: -

- the right to be informed about our collection and use of your personal data;
- the right to access the personal data we hold about you;
- the right to correct any inaccurate or incomplete personal data we hold about you;
- the right to erasure of your personal data;
- the right to have your personal data transferred to you or a third party in a common format (data portability);
- the right to object to direct marketing;
- the right to object to our use of your data for particular purposes; and
- the right to restrict the processing of your personal data.

Your requests will be properly considered. However, please be aware this does not automatically mean that we will agree to your request, as we may have other obligations that outweigh your rights. These will be discussed with you at the time of any such request by you.

We will inform you (before collecting your personal data) if we intend to use your personal data for marketing purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the platforms which we, or our partners, use to collect your personal data. You can exercise these rights at any time by contacting us using the contact details in paragraph 9 below.

If you wish to make a complaint about our collection or use of your personal data, please contact us using the contact details in paragraph 9 below and we will seek to resolve your complaint. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (ICO).

Please visit the ICO website <http://ico.org.uk> for further information about your rights and if you wish to lodge a complaint.

7. Removal of your details

You may request removal of your personal information or opt out of marketing communications from us at any time by sending an email to Morrello Clinic at clinicreception@morrello.co.uk.

Morrello Clinic may, however, retain certain de-identified aspects of your personal details for our internal business purposes such as maintaining records of our dealings with you and analysis and statistics.

8. Access to your details

If you would like to access a copy of any personal data which Morrello Clinic holds about you, or if you wish to change your consent regarding email marketing communications, please send a request by email or by post using the appropriate contact details in paragraph 9 below.

You have the right, in certain circumstances, to object to Morrello Clinic processing your personal data or to request that your personal data is corrected or deleted. Please contact us to discuss this as required.

9. Contact for Enquiries

If you have any queries in relation to the processing of your personal data by Morrello Clinic, please contact us on the following contact details:

Morrello Clinic
Nelson House
Langstone Business Park
NP18 2LH

Email: clinicreception@morrello.co.uk

10. Version Control

This policy is version 1.0 and was last updated on 25 May 2018.