



UWE Bristol Eye Clinic | Glenside Campus | Blackberry Hill | Bristol | BS16 1DD
eyeclinic@uwe.ac.uk | 0117 328 3300

UWE BRISTOL EYE CLINIC – PATIENT PRIVACY NOTICE

This statement explains how UWE Bristol Eye Clinic collects, manages, and uses your personal information, and the very limited conditions under which we may disclose it to others.

Our contact details

UWE Bristol Eye Clinic
Glenside Campus
Blackberry Hill
Bristol
BS16 1DD

Telephone: 0117 328 3300

E-mail: eyeclinic@uwe.ac.uk

Why we collect and process your personal data

Your personal data is processed by the University of the West of England (UWE) Bristol because you are using services provided by UWE Bristol Eye Clinic. UWE Bristol is registered as a Data Controller with the Information Commissioner Office (ICO) and is responsible under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act, 2018, for the personal data we hold.

We collect and process your personal data for the purposes of healthcare to identify you, enable safe and effective treatment, and communicate with appropriate health professionals. Our lawful bases for processing personal data for healthcare purposes, including keeping patient record cards, dispense of spectacles, and appointment reminders, are public interest or legitimate interests:

When we provide services under the National Health Service General Optical Services contract (e.g., a sight test funded by the NHS), our lawful basis for processing personal data is the performance of a task carried out in the public interest.

For other services, including services for privately funded patients or provision of primary eye care services under the NHS Standard Contract, the dispense of spectacles, or to send reminders for future appointments, our lawful basis for processing personal data is legitimate interests.

Our condition for processing 'special category' data (i.e., data concerning health) is the provision of health care.

We process your personal data with your consent for marketing purposes so we can tell you about the most appropriate eye care products and services that may be of interest to you. The legal basis for processing data for marketing purposes is legitimate interests – we will provide information that we believe is of genuine interest to you. If you do not want us to process your personal data for marketing purposes, please let us know and we will stop without charging you a fee.

We process your personal data for the purpose of processing payments. The lawful basis for this is contract when you have agreed to provide personal data, including credit or debit card and bank account details such as account holder name and address, to pay for goods or services ordered.

We collect CCTV footage and other information obtained via electronic means, such as Automatic Number Plate Recognition (ANPR) images and Body Worn Video footage for the prevention and/or detection of crime



and prosecution of offenders. Our lawful bases for processing this data are legitimate interests and public task. See the UWE Bristol Data Protection Policy (<https://www.uwe.ac.uk/about/structure-and-governance/data-protection/data-protection-statement-and-policy>) for further information.

We may use your personal data for teaching and training purposes but only when you have given permission for these uses. Only the minimum personal data required and, wherever possible, pseudonymised information, will be used for such purposes. You have a choice whether or not to have students perform or be present during a consultation.

We may use your personal data to contact you for the purposes of research and development and for sitting as a standardised patient. You have a right to choose whether your personal information is used for such purposes.

Data we collect and process

We mainly collect information from you when you give it to us voluntarily, but we may also collect it from other sources if it is legal to do so. This includes from the NHS or other healthcare providers, such as data in referral letters from the organisation that referred you to UWE Bristol Eye Clinic, institutions, or people you have authorised to provide information on your behalf (e.g., parents or guardians), third-party service providers, government, tax or law-enforcement agencies, and others. We can also combine this information with information from public sources.

The personal data that we may collect and process includes:

- Your name.
- Your date of birth.
- Your postal address.
- Your contact telephone number(s) and email address.
- Your NHS number.
- Your employment, lifestyle, and driving information.
- Your relevant health details including:
 - (a) Any relevant signs or symptoms.
 - (b) Current and past eye health conditions, general health conditions, and spectacle and contact lens prescriptions.
 - (c) Current medication details.
 - (d) Correspondence between your optometrist and your GP or ophthalmologist.
 - (e) Information relevant to your continued care from other people who care for you or know you well, such as other health professionals and relatives.
- Your examination and test results, including medical photographs, scans, images, and related treatment information ('Medical Imaging Data').
- Payment details.
- Information that you provide by filling in forms on our website.
- Details of your visit to the website and any transactions you carry out on the website. See the UWE Bristol Website Privacy Policy (<https://www.uwe.ac.uk/about/website/privacy>) for further information.
- Any other information you have voluntarily given us.

How we hold and share your personal data

We process your personal data in strict confidence. Data is stored securely and accessed on a need to know basis. We ensure that equipment holding your personal data is physically protected and is secured to prevent unauthorised access to your data. Electronic data is stored and processed securely on UWE Bristol approved

systems including Optix Software within their UK facilities that are certified to ISO 27001. Direct Debit payments will be processed by Eyecare Payments Ltd. We do not allow our third-party service providers (“data processors”) to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We usually keep any personal data we hold about you for ten years after our last contact with you. This is the period recommended as good practice by the College of Optometrists. If we collected the data when you were aged under 18, we will keep it for ten years or until your 25th birthday if that is later, in line with NHS requirements. In exceptional cases we may retain your information for longer and for as long as reasonably necessary to provide our products and services and to maintain records to satisfy legal requirements. Credit and debit card details are only kept for the duration of the transaction.

In the course of processing your personal data we may share it with:

- Healthcare professionals working at UWE Bristol Eye Clinic and those under their supervision.
- Healthcare professionals at other optical practices, but only if you have requested that we share your personal data (e.g., your prescription) with them.
- Your GP, other optometrists, ophthalmologists, and other healthcare providers and commissioners, and suppliers of optical appliances or similar products, in connection with your healthcare treatment.
- Software providers for our patient record and invoicing systems, and financial institutions, so that we can keep patient records up to date and arrange payment for services provided to you.
- Other agencies to keep to any legal obligation (e.g., if we have been instructed to do so by a Court) and to protect the safety of yourself or others (e.g., if there is a concern that you are putting yourself or another person at risk of serious harm or there is concern that you are putting a child at risk of harm).
- Healthcare providers and teaching staff and students from UWE Bristol and other education institutions for training and teaching purposes, only when you have given your permission to do so.

Your rights and choices

In respect of your personal data held by us, you have the following qualified rights:

- The Right to Access: you have the right to access your personal data.
- The Right to be Informed: you have the right to be informed how your personal data is collected and used.
- The Right to Rectification: you have the right to ask us to correct personal data about you that is inaccurate or incomplete.
- The Right to Restrict Processing: you have the right to request that we cease processing your data if you consider it inaccurate or incomplete and/or you object to the reason we are processing your data.
- The Right to Erasure (also known as the ‘Right to be Forgotten’): you have the right to ask us to delete your personal data in certain circumstances. However, this right does not apply to patient data that we process for healthcare purposes, such as patient records. We will not usually delete healthcare data before our usual time limit (see ‘how we hold and share your personal data’ above) where we have a duty to keep accurate records (e.g., to comply with a legal obligation, or in connection with a legal claim).
- The Right to Object: you have the right to object to our processing in certain circumstances (e.g., marketing purposes) unless we are processing the data in respect of a legal claim or can otherwise show that our legitimate interest in processing the data overrides your rights and interests.
- The Right to Data Portability: you have the right to request your personal data in a way that is accessible and machine-readable or transfer your data to another organisation where you have

consented to our processing your data or where the processing is necessary for us to deliver a contract.

- Rights relating to Automated Decision-Making and Profiling: we do not envisage that any decisions will be taken about you using automated means. However, we will notify you in writing if this position changes.

You also have an unreserved right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Hotline: 0303 123 1113

Email: <https://ico.org.uk/concerns/>

To find out more or to exercise any of these rights please contact the Data Protection Officer:

Data Protection Office
7X220 Frenchay Campus
UWE Bristol
Coldharbour Lane
Bristol
BS16 1QY

Telephone: 0117 328 6776

Email: dataprotection@uwe.ac.uk

To protect your privacy and the privacy of others, we will verify your identity before giving effect to your rights. To find out more about your rights please see our GDPR Data Subject Rights Policy, which is available at <https://www2.uwe.ac.uk/services/Marketing/about-us/pdf/Policies/GDPR-Data-Subject-Rights.pdf>