
GDPR Privacy Notice – January 2025

Our contact details:

Name: Mr Vahé Cooper
(Data Controller for Cooperflack Ltd – T/A Mr Vahé Cooper Consultant Oral Surgeon)

Address: Harley Street Maxillofacial Clinic
107 Harley Street
London
W1G 6AL

Phone: 07590 406700

E-mail: headmed@hcaconsultant.co.uk

Joint Data Controller:

In certain situations, for example when you are receiving treatment at a hospital under our care, we may work with these partners on a Joint Data Controller basis.

The type of personal data we collect and process:

- Personal identifiers, contact details and characteristics
- Details of medical insurers, 3rd party sponsors and other payment methods
- Contemporary and historical medical data, including details of providers involved in your care

How we obtain personal data:

This is normally provided either directly by you, or by a 3rd party involved in your care. It can be obtained through digital channels, for example engagement with our website or by direct contact.

We retain this data to enable us to: -

- Address enquiries about our services
- Provide you with safe and appropriate care
- Contact your nominated contact or next of kin in an emergency
- Receive payment for our services
- Comply with statutory, legal and regulatory requirements as applicable to all parties

Who we may share this data with:

- Data Processors working for or on behalf of the Data Controller
- Next of kin or nominated contact in an emergency
- Healthcare professionals who have referred you to our care
- Healthcare partners and professionals involved in providing your historical or current care
- Insurers and 3rd party sponsors responsible for payment of our services
- 3rd Parties in the engagement of the Data Controller pursuant to the Data Controller's legitimate interest and statutory obligation.
- Statutory bodies where the Data Controller has a statutory obligation

Why we may share this data:

- To communicate with your nominated contact, next of kin or other healthcare provider in an emergency. You should obtain the consent of any nominated contact or next of kin for sharing of their personal data with us.
- To ensure healthcare professionals who have referred you to our care are informed and updated on your diagnosis and treatment plan
- To seek additional clinical investigations, opinion and clarification from healthcare partners and professionals directly involved in providing your historical or contemporary care
- To make bookings with healthcare partners for tests or treatment
- To provide you with safe and appropriate care
- To make onward referrals for your continuing care with colleagues
- To enable payment for our services
- To comply with statutory legal and regulatory requirements as applicable to all parties

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this data are:

For processing of personal and non-special category data: -

Article 6 (1)(f) - legitimate interest

Additionally

For processing of special category (health) data: -

Article 9(2)(h) - medical diagnosis & the provision of healthcare and treatment

How we store and secure your personal data: -

- Internal access to your data is restricted to the Data Controller and their Data Processors.
- Electronic information is stored in secure, encrypted practice management software and email servers.
- Paper records are securely stored.

How long do we retain your personal data: -

- We keep all data in respect of patients, who have attended an appointment, in line with statutory legal requirements for retention of that data.
- Data in respect of unregistered patients who have not attended for an appointment is kept for 30 days from the date of receipt.

How we destroy your personal data: -

- Electronic data is erased and permanently deleted from our software
- Paper format data is physically destroyed in a secure environment.

Under data protection law, you have rights including: -

- **Your right of access** - You have the right to ask us for copies of your personal data.
- **Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete data you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

- **Your right to object to processing** - You have the the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month from our receipt of this request to respond to you.

To complain or make at data request, please contact: -

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Phone: 07590 406700

E-mail: headmed@hcaconsultant.co.uk

More information on the requirements of UK GDPR is available from the ICO. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address is:

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

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

COOKIE POLICY

Cookies are small text files that download on to your computer and are used to make our website work more efficiently and to analyse activity on our website.

Additionally, Cookies can also be used to provide information and track your personal website and online activity.

Our website has been designed to operate without the use of these cookies or similar tracking tools.

We do not track your browsing activity.

We do not store information about your preferences

We do not store login credentials,

We do not allow third-party services to place cookies on your device through this website.

The WisdomBot does not collect any personal information. It is operated by an external website – IBM

Watson. The only information collected by the WisdomBot is the questions that can and cannot be answered.

Essential cookies

<u>Name</u>	<u>Purpose</u>	<u>Expires</u>
CookieControl	This cookie is used to remember your choice about cookies on ico.org.uk .	90 days
language	This cookie is used to remember any selection you have made about language on ico.org.uk using the language selector, so that the site will be shown in your chosen language when returning to the site.	7 days

Analytics cookies (optional)

<u>Name</u>	<u>Purpose</u>	<u>Expires</u>
Silktide analytics javascript	Silktide analytics javascript is used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. We collect information including the number of visitors to the website, where visitors have come to the website from and the pages they visited.	24 hours

The information is collected and processed in a way that does not directly identify anyone. Once the information is collected, the IP address and browser details of a visitor is used to create a 'magic number' that changes every 24 hours. The IP address and specific browser details are immediately forgotten and never stored.

Video player cookies (optional)

Our site contains some video content. If you don't enable video player cookies, video content will appear as standard links, which will take you to YouTube and Vimeo to watch the videos. YouTube and Vimeo may set cookies when you use their sites. Or, if you enable video player cookies, you'll see videos embedded in our pages and YouTube and Vimeo may receive information about the videos you watch for analytics and advertising purposes.

YouTube embedded player

Example cookies	Purpose	Expires
AEC APISID HSID NID SAPISID SID* SSID SOCS _Secure*	We embed videos from our official YouTube channel, using YouTube's privacy-enhanced mode. You can read about YouTube's privacy-enhanced mode on YouTube's embedding videos information page. If you visit a page containing a YouTube video and are logged in to a YouTube or Google account, Google may use cookies for security purposes, remember your preferences, and receive information about the videos you watch for analytics and advertising purposes cookies and collect data linked to your Google account. For more information, see the Google Privacy Policy.	Between 180 and 400 days

Vimeo embedded player

Example cookies	Purpose	Expires
_cf* _ga* _gid _uet* _builderSessionid language Optanon* sd_client_id vimeo* vuid	We embed videos from our official Vimeo channel using Vimeo's Do Not Track setting. You can read about this on Vimeo's embedding videos page. Vimeo may use cookies to enable the video to play, remember your preferences and maintain the security of its service. If you visit a page containing a Vimeo video and you are logged in to your Vimeo account or if you've visited the Vimeo website before the ICO website, Vimeo may use cookies eg to keep you logged in, for analytics and advertising purposes, and collect data linked to your Vimeo account. For more information, see the Vimeo cookies policy.	Between 0 and 400 days

*indicates various cookies that contain additional letters, numbers or characters in their name.

Cookies on our careers site – *currently N/A*

We use these cookies on the external career site:

- **Session management cookies:** User, device, and session ID cookies along with timestamp cookies for timing out sessions after inactivity. These cookies expire at the end of the session.
- **Routing cookies:** To forward requests for a single session to the same server for consistency of service. These cookies expire at the end of the session.
- **Application:** Security Management (ASM) cookies - To help protect web applications and infrastructure from security attacks. These cookies expire at the end of the session.

<u>Name</u>	<u>Purpose</u>	<u>Expires</u>
PLAY_LANG, PLAY_SESSION, timezoneOffset, wd-browser-id	User, device, and session ID cookies along with timestamp cookies for timing out sessions after inactivity.	When you close your browser
TS*	Helps prevent cyber attacks on the user's interactions with the enterprise cloud applications. Verifies that the domain and subdomain cookies sent between the web server and the client aren't altered.	When you close your browser
CALYPSO_ CSRF_TO KEN	Contains a CSRF token to prevent cross-site request forgery attacks, that is, to prevent a user from carrying out unintended operations on the career site.	When you close your browser
Naming convention of WorkdayLB_* WorkdayLB_ UICLIE NT, WorkdayLB_SAS	Used to forward requests for a single session to the same server for consistency of service.	When you close your browser