**Privacy Notice**

**BACKGROUND:**

 Global Dental understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information about us

We are a Limited Company registered in England under company number 12122097.

Our Registered and Trading address is:

Global Dental Scheme Ltd

18a Darebsury Court

 Evenwood Close

 Runcorn

 WA7 1LZ

Data Protection Contact Details: Jeanette Woodall

Email address: assist@globaldentalscheme.co.uk

Telephone number: 0333 3580 499

Postal Address: See above

1. What does this notice cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

1. What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

1. What are my rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

* + - 1. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 1.
			2. The right to access the personal data we hold about you. Part 10 will tell you how to do this.
			3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
			4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
			5. The right to restrict (i.e. prevent) the processing of your personal data.
			6. The right to object to us using your personal data for a particular purpose or purposes.
			7. The right to data portability. This means that, if you have provided personal data to us directly, we are using them with your consent or for the performance of a contract, and that data are processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
			8. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner’s Office - <https://ico.org.uk/your-data-matters/>

If you have any cause for complaint about our use of your personal data, we’d like it if you’d give us a chance to resolve this for you by contacting us on 0333 3580 499. If you are still not satisfied, you may make a complaint to the Information Commissioner’s Office - <https://ico.org.uk/make-a-complaint/>

1. What Personal Data Do You Collect?

We collect some or all of the following personal data directly from you (this may vary according to your relationship with us):

* Name;
* Date of birth;
* Address;
* Email address;
* Telephone number.

Your personal data may also be obtained through third parties:

* Special category personal data relating to your dental health from your **dental practice, treating dentist or other medical/dental professional**
* Financial and plan status from **Patient Plan Direct Ltd**.
1. How do you use my personal data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used forthe following purposes:

* Responding to queries from you. Your identification and contact data and sometimes plan reference number are required in order for us to respond to your questions about our services;
* Supplying our services to you. Your identification, contact and sometimes medical and plan payment status data are required in order for us to review and process your Request for Assistance;
* Communicating with you. This may include responding to emails or calls from you.
1. How long will you keep my personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods:

* Your personal identification data will be retained for 2 years and then will be fullyanonymised. We retain this data for business auditing purposes to monitor the volume and type of Requests for Assistance we receive.
* Any special category medical data collected will be retained for 2 years and then will be securely deleted or destroyed. We retain this information for this length of time should you have any queries about a Request for Assistance made by you.
* Any emails and other correspondence unrelated to service requests or customer contracts will be retained only for 6 months and securely deleted after this time, as will any backup copies of the data. Any emails and other correspondence related to a Request for Assistance made by you will be retained for 2 years to allow us to retrieve your customer details should you have queries about any Request for Assistance made by you.
1. How and where do you store or transfer my personal data?

Our organisation’s server is based in London, UK. We will not share your data outside of the UK.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following to protect our database:

* Two-factor authentication
* Login IP ranges and timeout thresholds
* Strong password security
1. Do you share my personal data?

Where appropriate we may share your personal data will *with?* a medical practitioner or dental professional to assess your Request for Assistance.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Part 8 *there aren’t any third-party obligations in Part 8*.

1. How can I access my personal data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use on our website. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

1. How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details, marking communications for the attention of Jeanette Woodall:

Email: assist@globaldentalscheme.co.uk

Phone: 0333 3580 499

Address: Global Dental Scheme Ltd

 18a Daresbury Court

 Evenwood Close

 Runcorn

 WA7 1LZ

1. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available at [www.globaldentalscheme.co.uk](http://www.globaldentalscheme.co.uk)