

PRIVACY POLICY

LEAD CLINIC

LEAD understands that your personal data is entrusted to us and appreciates the importance of protecting and respecting your privacy. To this end we comply fully with the data protection law in force in the UK ("Data Protection Laws") and with all applicable clinical confidentiality guidelines including those published from time to time by the General Medical Council.

This Privacy Policy sets out the basis on which we collect and process personal data about you including our practices regarding the collection, use, storage and disclosure of personal data that we collect from you and/or hold about you, and your rights in relation to that data.

Please read the following carefully to understand how we process your personal data. By providing your personal data to us or by using our services, website or other online or digital platform(s) you are accepting or consenting to the practices as described or referred to in this Privacy Policy.

For the purpose of Data Protection Laws, the data controller is LEAD CLINIC Ltd, and can be contacted at contact@leadclinic.org

When we refer to 'we', 'us' and 'our', we mean LEAD.

What information do we collect?

We receive, collect and store any information you enter on our website or provide to us in any other way. Some of this information may be personal information/data.

When we refer to personal data in this policy, we mean information that can or has the potential to identify you as an individual.

Accordingly, we may hold and use personal data about you as a customer, a patient or in any other capacity, for example, when you visit one of our websites, complete a form, access our services or speak to us. Depending on what services you receive from us this may include sensitive personal data such as information relating to your health.

Personal data we collect from you may include the following:

- information that you give us when you enquire or become a customer or patient of us or apply for a job with us including name, address, contact details (including email address and phone number)
- the name and contact details (including phone number) of your next of kin
- details of referrals, quotes and other contact and correspondence we may have had with you
- details of services you have received from us or which have been received from a third party and referred on to us
- information obtained from customer surveys, promotions and competitions that you have entered or taken part in
- recordings of calls we receive or make
- notes and reports about your health and any treatment and care you have received and/or need, including about clinic visits
- patient feedback and treatment outcome information, you provide
- information about complaints and incidents
- information you give us when you make a payment to us, such as financial or credit card information
- other information received from other sources, including from your use of websites and other digital platforms we operate or the other services we provide, information from business partners, advertising networks, analytics providers, or information provided by other companies who have obtained your permission to share information about you.

Where you have named someone as your next of kin and provided us with personal data about that individual, it is your responsibility to ensure that that individual is aware of and accepts the terms of this Privacy Policy.

Where you use any of our websites, we may automatically collect personal data about you including:

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We may also use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page.

The data that we request from you may include personally identifiable information (including name, email, communications) as well as sensitive personal data. This includes information that relates to the mental or physical health or racial or ethnic origin (which may include children's data). By providing us with sensitive personal data, you give us your explicit consent to process this sensitive personal data for the purposes set out in this Privacy Policy.

When do we collect personal data about you?

We may collect personal data about you if you:

- visit one of our websites
- enquire about any of our services
- register to be a customer or patient with us or book to receive any of our services
- fill in a form or survey for us
- carry out a transaction on our website
- participate in a competition or promotion or other marketing activity
- make payments
- contact us, for example by email, telephone or social media participate in interactive features on any of our websites.

In the interests of training and continually improving our services, calls to LEAD and its agents may be monitored or recorded.

What personal data we may receive from third parties and other sources? We

may collect personal data about you from third parties;

We may be passed medical information usually in the form of a referral for the purposes of an autism assessment with LEAD or a third-party consultant; Consultants may need to share your personal data and medical records with LEAD; This will normally be in the form of a referral and may consist of basic details e.g full name, date of birth, address, contact number and email address.

HOW DO WE USE YOUR PERSONAL DATA?

Your personal information will be used for the specific reasons as stated to provide an autism assessment service. Your personal data will be kept confidential and secure and will, unless you agree otherwise, only be used for the purpose(s) for which it was collected and in accordance with this Privacy Policy, applicable Data Protection Laws, clinical records retention periods and clinical confidentiality guidelines.

Sensitive personal data related to your health will only be disclosed to those involved with your treatment or care, or in accordance with UK laws and guidelines of professional bodies or for the purpose of clinical audits (unless you object). Further details on how we use health related personal data are given below. We will only use your sensitive personal data for the purposes for which you have given us your explicit consent to use it.

Why do we collect personal information?

We collect Non-personal and Personal Information for the following purposes:

- *enable us to carry out our obligations to you arising from any contract entered into between you and us including relating to the provision by us of services or treatments to you and related matter such as, billing, accounting and audit, credit or other payment card verification and anti-fraud screening*
- *provide you with information, products or services that you request from us*
- *provide you with information about products or services we offer that we feel may interest you.*
- *allow you to participate in interactive features of our services, when you choose to do so*
- *notify you about changes to our products or services*
- *respond to requests where we have a legal or regulatory obligation to do so* □
check the accuracy of information about you and the quality of your care.
- *support your doctor, nurse or other healthcare professional*
- *assess the quality and/or type of care you have received (including giving you the opportunity to complete customer satisfaction surveys) and any concerns or complaints you may raise, so that these can be properly investigated*
- *to conduct and analyse market research*
- *to ensure that content from any of our websites is presented in the most effective manner for you and for your computer.*
- To create aggregated statistical data and other aggregated and/or inferred Nonpersonal Information, which we or our business partners may use to provide and improve our respective services;
- To comply with any applicable laws and regulations.

The security of your personal data

We protect all personal data we hold about you by ensuring that we have appropriate organisational and technical security measures in place to prevent unauthorised access or unlawful processing of personal data and to prevent personal data being lost, destroyed or damaged. We conduct assessments to ensure the ongoing security of our information systems.

Any personal data you provide will be held for as long as is necessary having regard to the purpose for which it was collected and in accordance with all applicable UK laws. Please [click here](#) for more information relating to retention periods.

Personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Where we transfer your personal data outside the EEA, we will ensure that there are adequate protections in place for your rights, in accordance with Data Protection Laws. By submitting your personal data, and in providing any personal data to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored securely. Any payment transactions will be processed securely by third party payment processors. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website, you

are responsible for keeping that password confidential. We ask you not to share a password with anyone.

The transmission of information via the internet cannot be guaranteed as completely secure. However, we ensure that any information transferred to our websites is via an encrypted connection. Once we have received your information, we will use strict procedures and security features for prevention of unauthorised access.

At your request, we may occasionally transfer personal information to you via email, or you may choose to transfer information to us via email. Email is not a secure method of information transmission; if you choose to send or receive such information via email, you do so at your own risk.

Disclosure of your personal data

In the usual course of our business we may disclose your personal data (to the extent necessary) to certain third-party organisations that we use to support the delivery of our services. This may include the following:

business partners, suppliers and sub-contractors for the performance of any contract we enter into with you, organisations providing IT systems support and hosting in relation to the IT systems on which your information is stored, third party debt collectors for the purposes of debt collection, delivery companies for the purposes of transportation, third party service providers for the purposes of storage of information and confidential destruction, third party marketing companies for the purpose of sending marketing emails, subject to obtaining appropriate consent.

Where a third-party data processor is used, we ensure that they operate under contractual restrictions with regard to confidentiality and security, in addition to their obligations under Data Protection Laws.

We may also disclose your personal data to third parties in the event that we sell or buy any business or assets or where we are required by law to do so.

Health information collected during provision of treatment or services

Sensitive personal data (including information relating to your health) will only be disclosed to third parties in accordance with this Privacy Policy. That includes third parties involved with your treatment or care, or in accordance with UK laws and guidelines of appropriate professional bodies. Where applicable, it may be disclosed to any person or organisation who may be responsible for meeting your treatment expenses or their agents. It may also be provided to external service providers and regulatory bodies (unless you object) for the purpose of clinical audit to ensure the highest standards of care and record keeping are maintained.

Clinicians working with us:

We share clinical information about you with our medical professionals and clinicians as we think necessary. Clinicians working with us might be our employees, or they might be

independent clinicians in private practice. In the case of independent clinicians the clinician is the data controller of your personal data, either alone or jointly with us and will be required to maintain their own records in accordance with Data Protection Laws and applicable clinical confidential guidelines and retention periods. Where that is the case, we may refer you to that clinician to exercise your rights over your data. Our contracts with clinicians require them to cooperate with those requests. In all circumstances, those individual clinicians will only process your personal data for the purposes set out in this Privacy Policy or as otherwise notified to you.

External practitioners: If we refer you externally for treatment, we will share with the person or organisation that we refer you to, the clinical and administrative information we consider necessary for that referral. It will always be clear when we do this.

Your GP: If the practitioners treating you believe it to be clinically advisable, we may also share information about your assessment with your GP. You can ask us not to do this, in which case we will respect that request if we are legally permitted to do so, but you should be aware that it can be potentially very dangerous and/or detrimental to your health to deny your GP full information about your medical history, and we strongly advise against it.

The NHS: If you are referred to us for assessment by the NHS, we will share the details of your assessment with the part of the NHS that referred you to us, as necessary to perform, process and report back on the assessment.

Medical regulators: We may be requested – and in some cases can be required – to share certain information (including personal data and sensitive personal data) about you and your care with medical regulators such as the General Medical Council or the Nursing and Midwifery Council, for example if you make a complaint, or the conduct of a medical professional involved in your treatment is alleged to have fallen below the appropriate standards and the regulator wishes to investigate. We will ensure that we do so within the framework of the law and with due respect for your privacy.

From time to time we may also make information available on the basis of necessity for the provision of healthcare, but subject always to patient confidentiality.

In an emergency and if you are incapacitated, we may also process your personal data (including sensitive personal data) or make personal data available to third parties on the basis of protecting your 'vital interest' (i.e. your life or your health).

We will use your personal data in order to monitor the outcome of your assessment/treatment by us and any treatment associated with your care, including any NHS treatment.

We participate in national audits and initiatives to help ensure that patients are getting the best possible outcomes from their treatment and care. The highest standards of confidentiality will be applied to your personal data in accordance with Data Protection Laws and confidentiality. Any publishing of this data will be in anonymised, statistical form. Anonymous or aggregated data may be used by us, or disclosed to others, for research or statistical purposes.

Marketing

If you have consented to our processing your personal data for marketing purposes, in accordance with this Privacy Policy, we may send you information (via mail, email, phone or SMS) about our products and services which we consider may be of interest to you.

You have the right to ask us not to process your information in this way at any time.

If you no longer wish to receive web based marketing information you can unsubscribe by emailing contact@leadclinc.org . While the precise timings vary we generally ask that you give us at least 30 days' notice.

Accessing and updating your information

The law gives you certain rights in respect of the personal data that we hold about you. In addition to your right to stop marketing, detailed above, below is a short overview of the most commonly-used rights. It is not an exhaustive statement of the law.

With some exceptions designed to protect the rights of others, you have the right to a copy of the personal data that we hold about you

You have the right to have the personal data we hold about you corrected if it is factually inaccurate. It is important to understand that this right does not extend to matters of opinion, such as medical diagnoses. If any of your personal data has changed, especially contact information such as: email address, postal address and phone number please get in touch with us so we can ensure your personal data is kept up to date

If you want to exercise your rights in respect of your personal data, the best way to do so is to contact us by email on contact@leadclinic.org In order to protect your privacy, we may ask you to prove your identity before we take any steps in response to such a request

If you are not satisfied with how we handle your request, you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website (<https://ico.org.uk/>).

Online visitors:

How do we store, use, share and disclose our website visitors' personal information?

Our website is hosted on the Wix.com platform. Wix.com provides us with the online platform. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

We only use personal confidential data supplied by you for your personal care and we do not disclose this information for any other uses.

How do we communicate with our site visitors?

We may contact you to notify you about our services, to book appointments, in order to collect fees or monies owed, to poll your opinions through surveys or questionnaires, to send updates about our company, or as otherwise necessary to contact you to enforce our User Agreement, applicable national laws, and any agreement we may have with you. For these purposes we may contact you via email, telephone, text messages, and postal mail.

How do we use cookies and other tracking tools?

Our website, like many others, stores and retrieves information on your browser using cookies. This information is used to make the site work as you expect it to. It assists us to maintain the security of the website and track the movement and action of visitors to our website. It is not personally identifiable to you, but it can be used to give you a more personalised web experience.

We use Google Analytics to keep track of visitors movements and actions on our website.

We use both session (transient) cookies and persistent cookies

How can our site visitors withdraw their consent?

If you don't want us to process your data anymore, please email us at contact@leadclinic.org

Privacy policy updates

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

If you would like to: access, correct, amend or delete any personal information we have about you, you are invited to contact us at contact@leadclinc.org

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