



# DATA PROTECTION, PRIVACY, AND COOKIE POLICY

Bio-Scientific Limited  
(t/a: Dr D.Hugh Rushton | Consultant Trichologist)

Effective From:  
01/01/2019

[www.dhrtrichology.com](http://www.dhrtrichology.com)  
[dhrtrichology@gmail.com](mailto:dhrtrichology@gmail.com)

## 1. About Us

Bio-Scientific Limited (t/a Dr D.Hugh Rushton | Consultant Trichologist) ("Bio-Scientific Limited", "us", "we", "the Clinic", or "our Clinic") is a trichological consultancy, research and retail company that specialises in the diagnosis and treatment of hair and scalp disorders. We are a limited company registered in England and Wales under company number 01689464 and our registered office is at: 2nd floor 21-22 Great Castle Street London W1G 0HZ.

Bio-Scientific Limited is the controller and responsible for your personal data.

Bio-Scientific Limited is committed to protecting and respecting your privacy. Our Data Protection, Privacy and Cookie Policy ("Privacy Policy") lets you know how we collect and use your personal data and tells you about your privacy rights. When we refer to "personal data" in this Privacy Policy, we mean information which can identify you as an individual. It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your data.

By (i) registering or placing an order at [www.dhrtrichology.com](http://www.dhrtrichology.com) (our "Website"), or (ii) placing an order for our services by calling our Clinic, or (iii) submitting a paper order form to us or (iv) giving us your details to record your registered interest in becoming our customer or patient in the future (v) giving us your details for us to contact you in relation to our services or business development or (vi) consenting to act as a parent or guardian for a registered or prospective patient under the age of 18, and giving your details in connection with this, you agree to the collection and use of your information under the terms of this Privacy Policy. If you do not agree to the data practices set out in this Privacy Policy, we will not be able provide you with our services.

## 2. Our Duties

As part of our legal duties, the Clinic is required to;

- Maintain full and accurate records of the care and services we provide you
- Keep records about you confidential and secure

## 3. Your Information

The Clinic aims to provide you with safe, high quality care that is based on accurate, up to date information.

This information allows us to work with others involved in your care and this may involve sharing information with other health and social care organisations.

### 3.1. Information Includes:

- Identity and correspondence details such as; name, address, date of birth, next of kin, email and telephone
- Contact we have had with you
- Notes and reports about your health and conditions
- Details and records about your treatment and care
- Marketing and Communications preferences
- Orders made by you, preferences, feedback and survey responses
- Financial payment and transaction details
- Information about how you use our services, and our Website

## 3.2. Others may also need to use records about you to:

- Check the quality of care you are receiving
- Help investigate any concerns or complaints you ask us to
- Teach students or staff
- Support health and social care research

## 3.3. Sometimes we share your information with third parties to support your care such as:

- NHS and Private General Practitioners
- NHS and Private Specialist Consultants
- NHS and Private Hospitals
- NHS and Private Allied Health Care Practitioners

When we are sharing information to support third parties in providing your care, we will work hard to ensure it is the minimum necessary and that it is done so securely and lawfully. We aim to ensure that we only use your personal information in a way that you would reasonably expect.

When we share information that is used for healthcare management or planning, this does not allow for you to be identified.

Sometimes we will be required to share information for other reasons;

- When required to by law
- We have special permission for health or research purposes (e.g. if you have agreed to take part in a research trial)
- There is a strong public interest (e.g. there is a risk of serious harm or crime)

## 4. How We Collect your Data

You may give us your Identity, Contact and Financial Data by corresponding with us via our Website, systems or communicating with our employees online, by email, on the telephone or by post. This includes personal data you provide when you:

- fill in paper forms or online forms via our Website, email, or in person at the Clinic.
- register to use our Website
- book an appointment with a consultant
- give us your details for us to contact you in relation to our services
- post any material on our Website
- place an order for our services via the website, email, telephone or in person at the Clinic
- request marketing communications to be sent to you
- enter a competition, promotion or survey
- give us feedback
- update your details via our website, email, telephone or in person at the Clinic

When you contact us (by phone, email or via our Website), we may keep a record of it and what you say to us.

We may also hold your Identity, Contact and Financial Data, if you have agreed for us to have this, in connection with you as a consenting parent or guardian of a patient who is under our care and is under the age of 18.

## 5. Objections

You can choose not to have information that could identify you shared beyond our Clinic. You can also choose to prevent information that does not identify you from being shared for planning and research.

Simply contact your consultant either to register an opt-out or end an opt-out you have already registered, and they will update your records. We will also be able to confirm whether or not you have registered an opt-out in the past and if you have, it will remain in place unless you change it.

## 6. Your Legal Rights

Under Data Protection law, you have a right to;

- object to certain uses of your data
- be provided with a copy of the information held about you
- ensure that your information will not be used for direct marketing purposes
- have any incorrect information amended or erased

Please contact the Clinic for any requests made in connection with these rights.

For a copy of your information;

- Your request must be made in writing to the Clinic
- The Clinic is required to respond to your request in writing within 30 days
- You will need to give the Clinic your full name, address and date of birth
- You will be required to provide personal identification such as a driving licence or passport

## 7. Use of the Website

Any data collected via our Website, for example; through online appointment booking, online form completion, or online ordering, will have the same confidentiality principles as those described above applied to it.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should be aware that we do not have any control over the other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting these sites.

## 8. Data Security

We intend to protect the confidentiality, quality and integrity of your personal information and we have implemented appropriate technical and organisational measures to do so. These include staff training, up to date policies and procedures and working to align with national cyber security guidelines.

## 9. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep certain basic information about our patients (including Contact, Identity, Financial, Transaction and Medical Data) for at least 7 years after they cease being an active customer, for both tax and "duty of care" purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### 10. Cookie Policy

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's storage.

If you register with us or continue to use our Website, you agree to us using cookies. Cookies are widely used to make websites work, or work more efficiently. They also provide useful information to website owners. A cookie is a small text file that is passed to your computer's hard disk through your web browser, so the website remembers who you are when you return.

We use the following cookies in our Website to give you a more personalised web service.

The first type is known as a "session-based" cookie and is allocated to your computer only for the duration of your visit to our Website. It helps you to move around the Website faster. This cookie automatically expires when you close down your browser.

The second type is a "persistent" cookie. These cookies store information between visits. For example, if you select the 'Remember me on this computer' box, your username and password are saved in a cookie on your computer. This means that the next time you log on to our Website using that computer you won't need to re-enter those details. We suggest you don't select the 'Remember me' box if you use a shared computer (for example, if you access the internet at a cafe, or at a shared or publicly available computer). The cookie file itself won't store your personal information.

Bio-Scientific Limited uses Google Analytics to track use of our Website. This helps us see how our Website is used by those who visit it. Google Analytics uses cookies to gather information about our visitors, such as which website you came from and which website you move on to afterwards. Google will use this information to evaluate your use of our Website, compile reports on this and provide other services relating to website activity. Information collected in this way is anonymous and individuals can't be traced. This information allows us to improve our Website and our services, for example, to measure the effect or success of our advertising campaigns and products.

The information generated by the Google Analytics cookie about your use of our Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google may also transfer this information to others, where they're required to do this by law, or where these others process the information on Google's behalf. Google undertakes not to associate your IP address with any other data held by Google.

For more information about Google Analytics, please see their privacy policy at: [www.google.com/policies/privacy](http://www.google.com/policies/privacy).

Bio-Scientific Limited also uses Google AdSense to place adverts about Bio-Scientific Limited products on other websites and manage referrals from those websites to our Website. If you arrived at our Website via one of those other websites, AdSense uses cookies to gather statistics about this.

Except for essential cookies, all cookies will expire after 12 months.

You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. If you want to stop cookies being stored on your computer in future, you should check your browser manufacturer's instructions by clicking "Help" in your browser menu. However, if you block all cookies (including essential cookies) you may not be able to access all or certain parts of our Website. Unless you have set your browser to refuse cookies, our system will issue cookies as soon you visit our Website.

If you want to delete any cookies that are already on your computer, you should check the instructions for your file management software to locate the file or directory that stores cookies. You can learn about and opt out of a number of commercial third-party cookies (including some used by Bio-Scientific Limited) at [optout.networkadvertising.org](http://optout.networkadvertising.org). Some of the opt-outs used by our commercial service providers require a cookie to be placed on your computer. This "opt-out" cookie is only used to tell the relevant cookie servers not to send you any more cookies. If you keep deleting cookies (including "opt-out" cookies) from your temporary internet files, you might need to repeat the opt-out process, the next time you visit our Website.

For more information about deleting and controlling cookie visit [www.youronlinechoices.com](http://www.youronlinechoices.com) or [www.aboutcookies.org](http://www.aboutcookies.org).

### 11. Contact

If you have any questions, comments and requests regarding our Data Protection, Privacy and Cookie Policy, including any requests to exercise any of your legal rights under it, please contact us using the details set out below.

Email: [dhrrichology@gmail.com](mailto:dhrrichology@gmail.com)

Post: 24 Harmont House, 20 Harley Street, London, W1G 9PJ

### 12. Date

This Policy is effective from 1<sup>st</sup> January 2019