

Privacy and Cookie Policy

Introduction

This Privacy and Cookie Policy will help you understand how Smiles Better Dental (“We/Us”/“Our”) collect, use and protect your personal data. We will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

This Policy only applies to your use of Our site at www.smilesbetterdental.com (the “Site”). Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing data to them.

Please read this Privacy & Cookie Policy carefully and ensure you understand it. You acknowledge that by providing your personal data to Us, you consent to Us using it in the manner outlined in this policy.

About Us

Smiles Better Dental is a limited company registered in England (Company Number 14186749) and has its place of business 243 Bury New Road, Whitefield, Manchester M45 8QP and its registered office at 243 Bury New Road, Whitefield, Manchester, M45 8QP.

We are the Data Controller and the Processor. We undertake data processing within the United Kingdom.

What is personal information?

Personal information can be anything that identifies and relates to a living person. This can include information that when linked with other information, allows a person to be uniquely identified. For example, this could be your name and contact details.

The law treats some types of personal information as 'special' because the information requires more protection due to its sensitivity. This information consists of:

- Full name including title
- Date of Birth
- Address
- Contact Information
- Treatment
- Medical History
- Payment Information
- Clinical Notes
- Gender
- Appointment Information

How We use your information

This Privacy Policy tells you what to expect when We collect personal information.

We provide a range of services to Our customers. We process the data provided by you and other sources to deliver the appropriate products and services.

We collect personal and non-personal data as part of providing services to you.

We also monitor and record calls, emails and any other communications in accordance with UK law.

We collect and process the following data about you:

- Information that you provide by filling in forms on Our Site. This includes contact information such as name, email address, mailing address, phone number, financial information, unique identifiers such as account number, password, date of birth and preferences information such as favourite's lists, transaction history, marketing preferences.
- Information that you provide to Us by telephone; email or face to face.
- If you contact Us, We may keep a copy of that correspondence.
- Details of transactions you carry out with Us and of the fulfilment of your treatment.
- Information obtained by us from third parties in accordance with this Privacy & Cookie Policy. For example, if you chose to apply for Finance, we may obtain additional information from Finance providers.

We will gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, to analyse trends, to administer Our Website, to track users' movements and to gather demographic information about our user base as a whole.

How We use your data

All personal data is processed and stored securely. We will comply with Our obligations and safeguard your rights under the General Data Protection Regulations (GDPR) at all times.

We will use your data for the following purposes:

- To refer you to dental practices
- When dealing with finance companies
- Dealing with complaints
- To work with the General Dental Council or Dental Complaints Services
- To comply with court orders
- For patient recalls or appointment scheduling
- To improve the general experience of our customers and of visitors to our websites, social media pages and practices.
- For managing any transactions you may elect to make and/or marketing choices or preferences you may have expressed (with consent)
- For archiving, research, or statistical purposes (including research and evaluation undertaken by Smiles Better Dental)
- Personalising and tailoring Our services for you
- Replying to emails from you
- Supplying you with emails that you have opted into (you may unsubscribe writing to us at info@smilesbetterdental.com at any time)
- Market research.

We may assign, transfer or delegate any of Our obligations or rights to any third party, provided that We are satisfied that such a third party is competent to perform or exercise the obligations or rights so delegated. We may provide information about you and your activities on the platform to any person/third parties to whom we assign, transfer or delegate our obligations or rights.

With your permission, We will also use your information for marketing purposes which may include contacting you by email, telephone and post with information, news and offers regarding Our products and services. You have the right to withdraw your consent to Us using your personal data at any time, and to request We delete it. (For further information, please refer to the section below on “Your Rights”).

How and where We store your data

We only keep your personal data for as long as We need to in order to use it as described in this policy, and for as long as We have your permission to keep it.

In order for Us to ensure that We are keeping your data for the correct purpose We will annually do as follows:

- Review the length of time We keep your personal data;
- Consider the purpose or purposes for which We hold the information in deciding whether (and for how long) to retain it;
- Securely delete information that is no longer needed for this purpose or these purposes, and
- Update, archive or securely delete information if it goes out of date.

The data that we collect from you may be transferred to, and stored at, a destination inside or outside the UK. It may also be processed by staff operating inside or outside the UK who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. Access to your information is limited to those who have a need to manage it. Where your information is transferred from the UK to a country that is not subject to an adequacy decision by the EU Commission, we will seek to ensure that it is adequately protected by (i) ensuring an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules are in place or (ii) relying on derogations (e.g. contractual necessity). A copy of the relevant mechanism can be provided for your review on request, using the contact details provided below.

Data Security

Data security is very important to Us and, in order to protect your data, We have taken suitable measures to safeguard and secure data collected through Our Site, using a third-party service to help maintain the security and performance of the Site. To deliver this service, it processes the IP addresses of visitors to Our Site.

How do We share your data?

We may share your data with affiliate businesses and with third party service providers (data processors), such as finance providers, compliance, and other agents relevant to the business activity. Where any of the data is required for such a purpose, We will take reasonable steps to ensure that your data will be handled safely, securely and in accordance with your rights, Our obligations and the obligations of the third party under the applicable law.

We would like to bring to your attention Our obligation to disclose data in the following four examples permitted by law, and the other situations set out below. These are:

- Where We are legally compelled to do so;
- Where there is a duty to the public to disclose;
- Where disclosure is required to protect Our interest, and
- Where disclosure is made at your request or with your consent.

Also, it may be necessary to share your details in the following circumstances:

- In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Smiles Better Dental or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

Data Processors

Data processors are third parties who provide elements of Our service on Our behalf. We have contracts in place with Our data processors meaning that they cannot do anything with your personal information unless We have instructed them to do so. They will not share your personal information with any organisation apart from Us. They will hold it securely and retain it for the period We instruct.

Visitors to Our Site

When someone visits Our Site, We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the Site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make any attempt to find out the identities of those visiting Our Site.

How can you control your data?

When you submit personal data via Our site, you may be given the option to restrict Our use of your data. In particular in regards to direct marketing purposes, you can opt out from receiving emails from Us and unsubscribe by using links provided in Our emails and at point of providing your details.

Withdrawing your consent

You may withdraw your consent to Us using, disclosing and processing your personal data for a particular purpose(s) at any time.

To notify Us that you wish to withdraw your consent to Us using and sharing your personal data for a particular purpose(s), please complete the form and send it Us by email:

info@smilesbetterdental.com

or by post:

Smiles Better Dental
243 Bury New Road
Whitefield
Manchester
M45 8QP

Use of Our Cookies

A Cookie is a small text file that is placed and stored on your computer, mobile or other devices by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information about visitor behaviors to the website owner. The Cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. All cookies used by and on Our Site are used in accordance with the current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up prompt requesting your consent to set those Cookies. By giving your consent here you are enabling Us to provide the best possible experience and service to you.

Certain features on Our Site depend on Cookies to function. Law deems these Cookies to be 'strictly necessary'. These Cookies are shown in the table below, your consent will not be sought to place these Cookies, but it is important that you are still aware of them. You may still block these Cookies by changing your internet browser's settings.

If you wish to deny consent to the placing of Cookies, however, certain features of Our Site may not function fully or as intended. You can also choose to delete Cookies on your computer or device at any time.

Blogging

We may use a third-party service, to publish Our blog, and some of Our conference micro sites. These sites are hosted by 3rd parties. These 3rd parties may require visitors that want to post a comment to enter a name and email address. For more information about how these 3rd parties process data, please see their privacy notices.

People who email Us

Any email sent to Us, including any attachments, may be monitored and used by Us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to Us is within the bounds of the law.

Disclosure of personal information

We would like to bring to your attention Our obligation to disclose data in the following four examples permitted by law, and the other situations set out below. These are:

- Where We are legally compelled to do so;
- Where there is a duty to the public to disclose;
- Where disclosure is required to protect Our interest, and
- Where disclosure is made at your request or with your consent.

Making a complaint to Us

When We receive a complaint from an individual, We make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information We collect to process the complaint and to check on the level of service We provide. We usually must disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We will keep personal information contained in complaint files in line with Our Retention Policy. This means that information relating to a complaint will be retained for 5 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Your rights

From 25 May 2018, the General Data Protection Regulations (GDPR) come into force. Under the Data Protection Act 1998, you have the following rights as an individual which you can exercise in relation to the information we hold about you.

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold: The right to be informed about Our collection and use of personal data;

Right to access personal information

Data subjects may submit a Subject Access Request - to obtain a copy of the personal data that we hold about them in a structured and portable manner.

To make a Subject Access Request please write to:

The Data Controller
Smiles Better Dental
6 St Georges Parade
Wolverhampton
WV2 1BA
UK

You will need to provide the following documentation for verification purposes:

1. Your full name, address and any reference number We hold for you,
2. Identification documents showing name, address and signature;
3. A copy of your driving licence (shows all 3) or a copy of your passport and a recent utility bill or bank statement.

The right of rectification

We will seek to ensure that inaccurate or incomplete data will be rectified. The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details above).

The right of data subjects to erasure (Right to be forgotten)

You can notify Us if you wish to exercise your right to erasure. Such a withdrawal of consent does not affect the lawfulness of processing based on consent prior to the withdrawal. Data Subjects that exercise this right will be removed from any marketing or future contact. We may retain a copy of any personal data if the processing is necessary for the establishment, exercise or defence of legal claims.

The right to restrict

Where you contest the accuracy of your personal data, We will restrict the processing until both parties have verified the accuracy of the personal data. If the processing has been unlawful you may oppose erasure and request restriction instead. If We no longer need your personal data but you require the data to establish, exercise or defend a legal claim.

The right of portability

The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It will allow you to move, copy or transfer your personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to object to processing for the purposes of direct marketing

Data Subjects may notify Us if they wish to exercise their right to be removed from any direct marketing activities. Tokenise may still contact the data subject to fulfill any contractual obligations concerning the policies and services provided.

Changes to Our Privacy Policy

When We change the contents/conditions of Our existing privacy statements and or notices We will take all measures necessary to ensure that any changes are communicated to you in such a way that will ensure that you will actually notice them and read them.

This means, for example, that a notification of changes will be communicated by way of an appropriate means (e.g. email/ hard copy letter etc.) specifically devoted to those changes.

The right to make a complaint

If you have any cause for complaint about Our use of your personal data, please contact Us using info@smilesbetterdental.com. We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office. <https://ico.org.uk/global/contact-us/>

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

How to contact Us

If you want to request information about Our Privacy Policy, you can contact Us:

Email Us on: info@smilesbetterdental.com

Call Us on: 01902 902114

Write to us:

Smiles Better Dental
243 Bury New Road
Whitefield
Manchester
M45 8QP

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