

Privacy Notice

Gower Health Clinic

Last updated: 5/10/26 | Version 1.0

This notice explains how Gower Health Clinic collects, uses, shares and protects your personal information when you visit us, book an appointment, use our website or contact us. It is written to meet the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We have tried to keep it clear and straightforward. If anything is unclear, please ask us.

1. Who we are and how to contact us

Gower Health Clinic is a "controller" of your personal information, which means we decide how and why it is used. Because our practitioners are self-employed, your treating practitioner is also a controller of your clinical records (explained below).

- Business name: Gower Health Ltd. (Owner Jennifer Sloane), trading as Gower Health Clinic
- Address: 18 Manselfield Road, Murton, Swansea, SA3 3AR
- Telephone: 01792 446366
- Email for privacy matters: gowerhealthclinic@gmail.com
- ICO registration number: ZB409820
- Person responsible for data protection: Jennifer Sloane

Self-employed practitioners. All of the practitioners and therapists who work at Gower Health Clinic are self-employed. Gower Health Clinic is responsible for the booking system, payments, website, reception and general administration. The practitioner who treats you is responsible for your clinical records and how they are used, and is bound by professional confidentiality and the standards of their regulator. Practitioners use the clinic's systems, including Cliniko, under an agreement with us. This notice applies to both the clinic and our practitioners.

2. The personal information we collect

We only collect what we need to look after you safely and run the clinic. This may include:

Type of information	What it includes
Identity and contact details	Name, date of birth, address, email address, telephone number, emergency contact, GP details, and, for children, the name and contact details of a parent or guardian.
Health information (special category data)	Your medical history, symptoms, medications, examination findings, diagnoses, treatment notes and plans, progress and outcome measures, and letters or reports from your GP or other healthcare professionals. Where relevant to your treatment, this may include information about your work, sport or hobbies, such as horse riding.

Type of information	What it includes
Booking and payment details	Appointment dates and times, cancellations, invoices and payment records. Card payments are processed by our payment provider and we do not store your full card details.. If you claim through a health insurer, we hold your policy details.
Communications	Emails, letters, messages, calls and forms you send us, including through our website contact form.
Photographs and videos	Only where you have agreed, for example video of you riding so we can assess posture and movement (see section 6).
Feedback and reviews	Comments you give us directly, and reviews you choose to post publicly.
Website and technical information	IP address, browser and device type, pages visited and cookies (see section 11).

We usually collect this information directly from you (or your parent or guardian). With your agreement, we may also receive information from your GP, hospital or other healthcare professionals.

3. How and why we use your information

The law requires us to have a "lawful basis" for using your personal information, and an additional condition when we use health information. These are set out below.

What we use it for	Lawful basis (UK GDPR Article 6)	Additional condition for health information (Article 9)
Assessing, diagnosing and treating you, and keeping clinical records	Contract (Article 6(1)(b)): providing the service you have asked for	Provision of health care by a professional bound by confidentiality (Article 9(2)(h))
Booking, reminders, cancellations and managing your appointments	Contract (6(1)(b)) and legitimate interests (6(1)(f)): running the clinic efficiently	Provision of health care (9(2)(h)), where health details are involved
Taking payments, invoicing, accounting and tax	Legal obligation (6(1)(c)) and contract (6(1)(b))	Not usually needed
Meeting our professional and legal duties, including General Osteopathic Council (GOsC) standards and safeguarding	Legal obligation (6(1)(c))	Provision of health care (9(2)(h)); for safeguarding, substantial public interest (9(2)(g))
Handling complaints, insurance matters and legal claims	Legitimate interests (6(1)(f))	Establishment, exercise or defence of legal claims (9(2)(f))
Sharing information with your GP or other healthcare professionals	Contract (6(1)(b)) and legitimate interests (6(1)(f)), with your agreement	Provision of health care (9(2)(h))
Taking and using photographs or videos	Consent (6(1)(a))	Explicit consent (9(2)(a))
Asking for feedback and reviews, and improving our service	Legitimate interests (6(1)(f)), or consent where required by law	We do not use your health information for this

What we use it for	Lawful basis (UK GDPR Article 6)	Additional condition for health information (Article 9)
Sending news, events or workshop information	Consent (6(1)(a))	Not used
Responding to enquiries and running and securing our website	Legitimate interests (6(1)(f)); consent for non-essential cookies	Not used

We do not use automated decision-making or profiling that has a legal or similarly significant effect on you.

4. Children and young people

We treat children's information with particular care. For babies and young children, we collect information from a parent or guardian, who must have parental responsibility. Older children who understand what is involved may be asked to agree to their own treatment and to how their information is used. Records relating to children are kept for longer than adult records (see section 8).

5. Contacting you: reminders, follow-up and reviews

We may contact you by email, text or telephone to confirm or remind you of appointments and for other matters directly connected with your care. Please tell us if you would prefer a different method.

After your visit, we may send you an email asking for your feedback and inviting you to leave a review. We only do this where you have agreed to hear from us or where the law allows it for existing patients, and every message will include a simple way to opt out. Reviews are always optional. We never offer rewards for reviews, and we will never ask you to post health details publicly. We send news, events or workshop information only with your consent. You can withdraw consent or opt out at any time by contacting us or using the unsubscribe option.

6. Photographs and videos

We may occasionally ask to take photographs or video, for example video of you riding so we can assess your posture and movement. We will only do this with your explicit consent, and we will explain why we need it, how it will be stored and who will see it. These images are kept securely with your clinical record, are not shared publicly or used for marketing without a separate, specific written consent, and are deleted in line with the periods in section 8. You can withdraw your consent at any time, and doing so will not affect your treatment.

7. Who we share your information with

We keep your information confidential and only share it where necessary. We do not sell your personal information. We may share it with:

- Your GP, hospital or other healthcare professionals, when it is in your interests and with your agreement (or where the law requires or allows it, for example to protect you or someone else from serious harm)

- Cliniko, our online booking and practice management system, which stores appointment details and clinical records on our behalf
- Wix, which hosts our website and processes messages sent through our contact form
- Google, which provides services such as Google Business Profile, reviews and analytics
- Gmail, SumUp (Payment System), Stripe (payment system), and IT support providers, where they handle information for us under a written contract
- Our accountants, insurers, professional advisers and legal advisers, where necessary
- Your health insurer, if you claim through one, and only the information needed for that claim
- Regulators and public authorities, including the GOsC, the Information Commissioner's Office, the police or the courts, where required by law

Service providers act only on our instructions and must keep your information secure. Your clinical records are held by the practitioner who treats you. Our reception and administrative team can see appointment and contact details, but only what they need to do their job.

Transfers outside the UK. Some of our providers may process information outside the UK. Cliniko, our booking and clinical records system, meets UK safeguards for any transfers of your information. For other providers, such as Wix and Google, we make sure appropriate safeguards are in place, such as UK adequacy regulations, the UK International Data Transfer Agreement or Addendum, or the UK-US Data Bridge.

8. How long we keep your information

We keep information only as long as needed for the purposes in this notice and to meet legal, insurance and professional requirements. After that, we delete or anonymise it securely.

Type of information	How long we keep it
Adult clinical records	8 years after your last appointment
Children's clinical records	Until the child's 25th birthday, or 8 years after their last appointment, whichever is later
Financial and accounting records	6 years after the end of the relevant financial year
Enquiries that do not lead to an appointment	12 months
Photographs and videos	Until your episode of care ends, or sooner if you withdraw consent.
Feedback and complaints	6 years from the date of the complaint or feedback
Marketing and review request preferences	Until you unsubscribe or withdraw consent; we keep a record of your opt-out so we do not contact you again

9. How we keep your information secure

We use appropriate technical and organisational measures to protect your information, including password-protected systems with two-factor authentication, access limited to those who need it, locked storage for any paper records, confidentiality obligations for all staff and practitioners, and written agreements with our service providers. If there is a data breach that is likely to put your

rights and freedoms at risk, we will report it to the Information Commissioner's Office within 72 hours where required, and we will tell you without undue delay if the risk to you is high.

10. Your rights

Under UK data protection law, you have the right to:

- Be informed about how your information is used (this notice)
- Access a copy of the personal information we hold about you
- Have inaccurate information corrected
- Ask us to erase your information. This is not absolute: we are required to keep clinical records for the periods in section 8
- Ask us to restrict how we use your information in certain circumstances
- Receive your information in a portable format, where we use it based on your consent or a contract and the processing is automated
- Object to our use of your information based on legitimate interests, and object at any time to direct marketing
- Withdraw your consent at any time, where we rely on it, without affecting the lawfulness of what we did before

To use any of these rights, contact us using the details in section 1. We will respond within one month, normally without charge. We may need to confirm your identity first, and for children we will usually deal with a parent or guardian.

11. Our website, cookies and social media

Our website is hosted by Wix. When you visit it, cookies and similar technologies may be used for essential functions such as security and, with your consent, for analytics and to improve your experience. You can manage your cookie preferences through the cookie banner on our site or your browser settings.

If you complete our contact form, we use the information you give us to reply to your enquiry. Please do not include detailed health information in the form: phone us or discuss it at your appointment instead. Our website links to third-party sites, including Facebook, Instagram, Google and our booking system. We are not responsible for their privacy practices, so please read their notices.

We only post identifiable photographs or stories about patients on our website or social media with their specific written consent.

12. Making a complaint

If you have a concern about how we use your information, please contact us first so we can try to put it right. You also have the right to complain to the Information Commissioner's Office (ICO), the UK data protection regulator:

- Website: ico.org.uk/make-a-complaint
- Telephone: 0303 123 1113

- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Concerns about an osteopath's professional conduct or standards of care can be raised with the General Osteopathic Council at osteopathy.org.uk.

Or please see our complaints procedure.

13. Changes to this notice

We may update this notice from time to time. The latest version will always be on our website, with the date it was last updated at the top. If we make significant changes, we will tell you.