

## Six Physio Privacy Notice

### Introduction

Here at Six Physio Limited, your privacy is important to us, and we are committed to protecting and safeguarding your data protection rights.

This privacy notice explains what happens to any personal data that you provide to us, as well as any information we may collect from you, or receive from other organisations, when you engage with our services or visit our website.

This notice explains:

- Who we are and the laws under which we are governed
- What information we collect
- How we use your personal information
- How we lawfully use your personal information
- Who we may share your information with
- How we keep your personal information safe
- Your individual data rights
- How long we retain your personal information
- How to raise a complaint
- How to contact us and the Information Commissioner's Office (ICO)

### Who We Are and Our Regulatory Responsibilities

Six Physio Limited is a provider of physiotherapy and musculoskeletal healthcare services, established in 1996.

- **Registered Office:** Carnac House, Cams Hall Estate, Fareham, Hampshire, PO16 8UZ
- **Company Number:** 06293080

For the purposes of applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, Six Physio Limited is a data controller.

We are registered with the Information Commissioner's Office (ICO) with registration number **ZA046336**.

Six Physio Limited forms part of the **Ascenti Group**.

## **What Information Do We Collect?**

### **Personal Information**

We collect personal information about you, including:

- Name, address, date of birth
- Telephone number and email address
- Emergency contact / next of kin details
- IP address and information about how you use our website

### **Special Category Personal Data**

As a healthcare provider, we also process special category personal data, including information relating to:

- Your health, medical history, and clinical records
- Assessments, treatment notes, rehabilitation plans, and outcomes
- Reports and correspondence
- Information received from other healthcare professionals, insurers, or referring organisations

### **Financial Information**

If you are responsible for paying for your treatment, we will require payment information. Six Physio does **not** store credit or debit card details; payment transactions are processed securely by third-party payment providers.

## **How Do We Collect Your Information?**

We collect information when you:

- Complete forms on our website
- Contact us by phone, email, or in person
- Register as a patient
- Attend appointments or classes at our clinics
- Use our patient portal or digital systems
- Are referred to us by an insurer, employer, or other healthcare provider

## How Do We Use Your Information?

We use your personal information to:

- Respond to enquiries and manage appointments
- Provide physiotherapy and related healthcare services
- Maintain accurate clinical and administrative records
- Communicate with you about your treatment and care
- Supervise, audit, and monitor the quality of clinical care
- Train and support our clinical staff
- Comply with legal, regulatory, and professional obligations
- Manage complaints, incidents, and legal claims
- Improve our services, systems, and website
- Send service-related communications and, where consented, marketing communications

## How Do We Lawfully Use Your Information?

Under the UK GDPR, we must have a lawful basis to process your personal data. The lawful bases we rely upon under **Article 6** of the UK GDPR include:

- **Consent**
- **Contract**
- **Legal obligation**
- **Vital interests**
- **Public task** (where applicable)
- **Legitimate interests**

## Processing Health Information

Due to its sensitive nature, health information requires additional safeguards. We process health data under **Article 9(2)(h)** of the UK GDPR, as processing is necessary for:

- Medical diagnosis
- The provision and management of healthcare and treatment

We may also process health data for clinical audit, supervision, and quality assurance purposes to ensure high standards of safe and effective care.

### Lawful Basis Table

Purpose	Article 6 Condition	Article 9 Condition (if applicable)
Providing physiotherapy and related healthcare services	Article 6(1)(b) – Contract	Article 9(2)(h) – Healthcare provision
Maintaining clinical records	Article 6(1)(c) – Legal obligation	Article 9(2)(h) – Healthcare provision
Clinical audit, supervision and quality assurance	Article 6(1)(f) – Legitimate interests	Article 9(2)(h) – Healthcare provision
Managing complaints, incidents and legal claims	Article 6(1)(f) – Legitimate interests	Article 9(2)(f) – Legal claims
Communicating service updates	Article 6(1)(f) – Legitimate interests	Not applicable
Marketing communications	Article 6(1)(a) – Consent	Article 9(2)(a) – Consent (if applicable)
Safeguarding adults and children	Article 6(1)(d) / (e) – Vital interests / Public task	Article 9(2)(b) / (h) – Safeguarding & healthcare

### Who Do We Share Information With?

We do **not** sell your personal information.

Where lawful and appropriate, your information may be shared with:

- Other companies within the Ascenti Group
- Healthcare professionals involved in your care, including GPs and consultants
- Diagnostic service providers
- Insurers, employers, or other instructing/referring parties
- Auditors and professional advisers
- Debt recovery providers, limited to necessary information
- Regulators, professional bodies, or statutory authorities

- Emergency services, courts or law enforcement agencies

We share only the minimum amount of information necessary for the intended purpose.

### **Safeguarding**

Six Physio is committed to ensuring that the principles and duties of safeguarding adults and children are applied consistently and ethically, with the welfare and safety of patients at the heart of our services.

Where a safeguarding concern is identified, we may process and share personal information to protect the individual concerned or others at risk.

Our lawful basis for processing personal data for safeguarding purposes under the UK GDPR is:

- **Article 6(1)(d)** – processing necessary to protect vital interests
- **Article 6(1)(e)** – processing necessary for a task in the public interest

Where special category data is processed, the relevant lawful bases include:

- **Article 9(2)(b)** – safeguarding of children and individuals at risk
- **Article 9(2)(h)** – healthcare and social care purposes

Information shared in safeguarding situations is limited to what is necessary and proportionate to manage the risk appropriately.

### **Transfers Outside the UK or EEA**

We do not routinely transfer personal data outside the United Kingdom (UK) or the European Economic Area (EEA). Most systems we use are hosted in the UK/EEA. However, limited transfers may occur in specific situations—for example, when a specialist supplier provides technical support from outside the UK/EEA, when encrypted cloud services use sub-processors in third countries, or when you access our services while temporarily overseas.

Whenever a transfer is necessary, we ensure it is lawful and protected. We will only transfer personal data where one of the following applies: (i) the destination country is covered by a UK adequacy regulation; (ii) we have put in place an appropriate safeguard such as the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses (SCCs); and, where relevant, (iii) we have completed a transfer risk assessment and implemented additional technical and organisational measures (for example, encryption in transit and at rest, strict access controls, logging and monitoring, and data minimisation).

Our contracts with overseas recipients require them to protect your information to UK GDPR standards and to process it only on our documented instructions. You can

contact us for more information about international transfers and, where appropriate, to receive a copy of the relevant safeguards in place.

### **How Long Do We Keep Your Information?**

We retain personal information only for as long as necessary, taking into account contractual requirements, legal and regulatory obligations, professional guidance and limitation periods. Healthcare records are typically retained for a minimum of **10 years** following treatment.

### **Your Individual Data Rights**

You have the following rights under UK data protection law:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure (in certain circumstances)
- Right to restrict processing
- Right to data portability
- Right to object
- Rights in relation to automated-decision-making and profiling.

### **Automated decision-making and profiling**

Six Physio does not make decisions about your care using automated systems alone. While we use digital tools to support our services, all decisions about your treatment are made by qualified healthcare professionals. You can ask us for more information about how any automated tools are used and request human review where relevant.

### **How to Make a Rights Request**

You can exercise your right of access, or any other data protection right, using the following methods:

- **By email:** support@sixphysio.com
- **By post:** Six Physio Limited, Carnac House, Cams Hall Estate, Fareham, Hampshire, PO16 8UZ
- **Verbally:** by speaking to a member of our team in clinic or over the telephone

There is no fee for making a request. We will respond within one month of receipt, subject to verification of identity. Where data has been deleted from live systems, it may remain securely stored within our backup systems for a limited period until it is routinely overwritten in accordance with our backup retention schedules.

### **How We Keep Your Information Safe**

We use technical and organisational measures to protect personal data, including secure systems, encryption, role-based access controls and staff training.

### **Use of Cookies**

Our website uses cookies to improve functionality and user experience. Further details are available in our Cookies Policy: [insert link to Cookie Policy]

### **Complaints and Contact Details**

If you have any concerns about how your personal data is processed:

#### **Data Protection Officer**

Six Physio's Data Protection Officer is provided by the **DPO Centre Limited**.

- **Email:** [support@sixphysio.com](mailto:support@sixphysio.com)

#### **Information Commissioner's Office (ICO)**

You have the right to raise a complaint with the ICO:

- **Website:** <https://www.ico.org.uk/concerns>

#### **Governing Bodies**

All Six Physio clinicians are registered with the Health & Care Professions Council (HCPC) and are members of the Chartered Society of Physiotherapy (CSP).