



PRIVACY POLICY NOTICE

MR EDWARD H SEEL

Last Updated: February 2026

Version: 2.0

Executive Summary

This Privacy Notice explains how I, Mr Edward H Seel, as your treating clinician and data controller, collect, use, and protect your personal information in accordance with UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Key Points:

- I use your personal information primarily to provide you with healthcare services, maintain medical records, and ensure continuity of care
- You have important rights including access to your records, correction of errors, and the ability to object to certain uses
- I share information only when necessary for your care, required by law, or with your consent
- I maintain robust security measures to protect your information

Please read this notice carefully. If you have any questions, please contact me using the details in Section 2.

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1. Introduction

This Privacy Notice sets out details of the information that I, as a clinician responsible for your treatment (including my medical secretaries and administrative staff), collect from you and how that information is used, stored, and protected.

As your treating clinician, I am a **Data Controller** in respect of your personal information. This means I am responsible for determining how and why your personal data is processed, and I must comply with UK data protection law including the UK GDPR and Data Protection Act 2018.

Please take time to read this Privacy Notice carefully. It is important that you understand how your information will be used and your rights in relation to that information.

2. About Me and Contact Information

2.1 Who I Am

In this Privacy Notice, "I," "me," or "my" refers to Mr Edward H Seel, the consultant clinician responsible for your medical treatment and care.

2.2 How to Contact Me

For General Enquiries:

Telephone: 01844 273375

Email: amanda.rice@bucks-spine.co.uk

Post: Mr Edward Seel, c/o Amanda Rice, The Chiltern Hospital, London Road, Great Missenden, Bucks, HP16 0EN

For Data Protection Queries:

If you have questions about how your personal information is used, wish to exercise your rights, or have concerns about data protection, please contact me using the details above and mark your correspondence "Data Protection Query."

2.3 Response Times

I will:

- Acknowledge data protection queries within 3 working days
- Provide a full response within one month
- Extend this by up to two additional months for complex requests (I will inform you if this is necessary)

3. What Personal Information Do I Collect?

3.1 Standard Personal Information

As one of my patients, the personal information I hold about you may include:

- Name and date of birth
- Contact details (postal address, email address, telephone numbers including mobile)
- Financial information (credit card details, insurance policy details)
- Occupation
- Emergency contact details and next of kin
- Background referral details

3.2 Special Category Data (Health Information)

I process **special categories of personal data** relating to your health, which requires additional legal justification and heightened protection under data protection law. This includes:

- Details of your current and former physical and mental health
- Healthcare you have received from other providers (GPs, dentists, hospitals, specialists)
- Details of clinic and hospital visits, consultations, and treatments
- Medicines prescribed and administered
- Test results, scans, and diagnostic imaging
- Details of services you have received from me
- Nationality, race, and ethnicity (where relevant to care)
- Religious beliefs (where relevant to care preferences)
- Genetic or biometric data
- Information about sex life or sexual orientation (where clinically relevant)

3.3 Medical Confidentiality

The confidentiality of your medical information is of paramount importance. I comply with UK data protection law and all applicable medical confidentiality guidelines issued by professional bodies including the General Medical Council, British Medical Association, Royal College of Surgeons, and the Nursing and Midwifery Council.

4. How Do I Collect Your Information?

4.1 Directly From You

Information may be collected directly from you when:

- You enter into a contract for healthcare services
- You attend consultations and receive treatment
- You complete enquiry or registration forms
- You correspond with me by letter, email, telephone, or social media
- You submit queries through my website or other platforms

Note: Telephone calls may be recorded for quality assurance and training purposes.

4.2 From Other Healthcare Organizations

To provide you with the best possible care, I may need to obtain information from other healthcare providers, including:

- Your GP
- Other specialists and consultants
- Hospitals (NHS and private, including BMI Healthcare, Spire Healthcare)
- Dentists
- Mental health providers

4.3 From Third Parties

I may also receive information from:

- Referring physicians or healthcare professionals
- Your family members or carers (with appropriate consent)
- Insurance providers
- Your employer (in limited circumstances)
- Government agencies (Ministry of Defence, Home Office, HMRC)
- Medical experts providing second opinions

5. Legal Basis for Processing Your Data

UK data protection law requires me to have a valid legal basis for using your personal information. The main legal bases I rely on are:

5.1 Contractual Necessity

Processing is necessary to provide healthcare services under our contract with you. This includes taking steps before entering into a contract (such as initial assessments) and performing the contract itself (providing treatment).

5.2 Legitimate Interests

I have genuine business needs to use your data where this does not override your privacy rights. My legitimate interests include:

- Maintaining accurate medical records for continuity of care
- Quality assurance and clinical audit to improve outcomes
- Defending against legal claims
- Managing billing and accounts
- Ensuring other healthcare professionals involved in your care have necessary information

Important: You have the right to object to processing based on legitimate interests (see Section 12).

5.3 Legal Obligation

Processing is necessary to comply with legal requirements, such as reporting to regulatory bodies, responding to court orders, or fulfilling statutory obligations.

5.4 Vital Interests

In rare emergency situations, processing may be necessary to protect your life or physical safety when you cannot give consent.

5.5 Consent

For certain specific purposes (such as marketing, some research projects, or sharing data with particular third parties), I will obtain your explicit consent. You can withdraw consent at any time.

5.6 Additional Legal Basis for Health Data

Because health information is particularly sensitive, I need an additional legal basis under Article 9(2) of UK GDPR. I primarily rely on:

- Provision of Health Care: Processing necessary for medical diagnosis, healthcare provision, treatment, or management of health systems
- Public Interest: Processing for public health, quality assurance, and statistical/research purposes with appropriate safeguards
- Legal Claims: Establishing, exercising, or defending legal rights

- **Explicit Consent:** Where specifically obtained for particular purposes

6. Purposes for Using Your Information

I use your personal information for the following purposes, each with its specific legal justification:

6.1 Setting You Up as a Patient

To register you as a patient, including carrying out necessary checks such as fraud prevention, credit checks, anti-money laundering, and regulatory compliance.

Legal basis: Contractual necessity (steps before entering into a contract)

Additional basis for health data: Substantial public interest and legitimate interests

6.2 Providing Healthcare Services

To provide you with medical treatment, care, and related healthcare services including consultations, procedures, prescriptions, and ongoing care management.

Legal basis: Contractual necessity (performance of contract)

Additional basis for health data: Provision of healthcare; vital interests (in emergencies)

6.3 Account Management and Billing

To manage your account, process payments, handle insurance claims, and maintain accurate billing records.

Legal basis: Contractual necessity; legitimate interests; consent (where applicable)

Additional basis for health data: Provision of healthcare; legal claims; consent

6.4 Clinical Audit and Quality Improvement

I may process your personal data for local clinical audit purposes—assessing patient outcomes and identifying improvements. You may object to this use (contact details in Section 2).

I may also share anonymized or identifiable data with UK national registries that have statutory approval, such as the British Spinal Registry and the British Association for Spinal Surgeons (BASS). Where statutory approval exists, consent is not required; otherwise, I will seek your consent.

Legal basis: Legitimate interests with appropriate safeguards

Additional basis for health data: Public interest for statistical and scientific research

6.5 Medical Research

I may participate in ethically approved medical research projects. Some projects have statutory approval allowing data sharing without consent; for others, I will seek your explicit consent.

Legal basis: Legitimate interests with safeguards; consent (where required)

Additional basis for health data: Public interest for research; consent (where required)

6.6 Communication and Complaint Resolution

To communicate with you about your care, respond to queries, and resolve complaints fully and properly.

Legal basis: Contractual necessity; legitimate interests

Additional basis for health data: Provision of healthcare; legal claims

6.7 Sharing With Other Healthcare Professionals

To ensure safe and effective care, I share relevant information with other healthcare professionals involved in your treatment (your GP, specialists, hospitals, etc.) and with individuals you have asked me to keep informed.

Legal basis: Contractual necessity; legitimate interests

Additional basis for health data: Provision of healthcare; substantial public interest; legal claims

Private Healthcare Information Network (PHIN)

Under the Competition and Markets Authority Private Healthcare Market Investigation Order 2014, I am required to share certain treatment data with PHIN to monitor safety and quality. I will only do so with your explicit consent. Information shared includes your NHS/CHI/Health and Care Number, procedure details, complications, and patient feedback. PHIN publishes only anonymized statistical data. More information: www.phin.org.uk

6.8 Legal and Regulatory Compliance

To comply with legal obligations, regulatory requirements, court orders, and to establish, exercise, or defend legal rights.

Legal basis: Legal obligation; legal claims

Additional basis for health data: Provision of healthcare/social care systems; legal claims

6.9 Business Operations

To manage business operations including maintaining accounting records, financial analysis, internal audit, and receiving professional advice (legal, tax, etc.). This generally does not involve special category health data.

Legal basis: Legitimate interests

6.10 Marketing (With Your Consent Only)

I may provide information about healthcare services and products that may interest you, but only where you have given explicit consent. You can withdraw consent at any time.

Legal basis: Consent; legitimate interests (with appropriate safeguards)

7. How I Communicate With You

I may communicate with you by telephone, SMS, email, and post. Communication methods will depend on the nature and urgency of the information.

7.1 Telephone Communications

If you are unavailable and calls go to voicemail, I may leave a message with basic details (who called, limited reason for call, callback information) to protect confidentiality.

7.2 SMS and Unencrypted Email

For appointment reminders and basic administrative information, I may use SMS or unencrypted email where you have indicated this preference on your registration form. These communications will not contain sensitive clinical information.

7.3 Encrypted Email for Medical Information

For medical information (test results, clinical updates) and invoicing, I will use encrypted email where you have provided an email address and indicated this preference. I will ensure you can access encrypted emails before sending critical information this way.

Important: Providing contact details and communication preferences does not rely solely on consent—processing is necessary to provide healthcare services. However, you can update preferences at any time.

8. Sharing Your Information

I may share your information with the following third parties for the purposes described in this notice:

- Healthcare professionals involved in your treatment (doctors, nurses, carers, specialists)
- Support staff (receptionists, porters, medical secretaries)
- Your nominated contacts (next of kin, emergency contacts, family members)

- NHS organizations (NHS England, Department of Health, NHS Resolution)
- Private healthcare providers (BMI Healthcare, Spire Healthcare, other facilities)
- Your GP and other referring clinicians
- Insurance companies (for claims processing)
- Private Healthcare Information Network (PHIN) – with your consent
- National audit programs and research registries (British Spinal Registry, BASS)
- Regulators (Care Quality Commission, Health Inspectorate Wales, Healthcare Improvement Scotland)
- Government bodies (Ministry of Defence, Home Office, HMRC)
- Police and law enforcement (where legally required)
- Professional advisers (lawyers, auditors, tax advisers)
- IT service providers and document management companies
- Credit reference and debt collection agencies (for billing purposes)
- Third parties in connection with business sale or transfer (with appropriate safeguards)

Communications with third parties may be by email, post, fax, or telephone, with appropriate security measures in place.

9. Data Retention—How Long We Keep Your Information

I retain your personal information only as long as necessary for the purposes outlined in this notice and to comply with legal obligations.

9.1 Retention Periods

Record Type	Retention Period
Medical Records (Adult)	Minimum 8 years after last treatment, or longer if clinically justified
Medical Records (Children)	Until 25th birthday, or 26th if treated at age 17, or 8 years after death if sooner
Financial Records	7 years after last transaction (HMRC requirement)
Insurance Records	7 years after case closure
Clinical Correspondence	As part of medical record
General Correspondence	2 years after resolution
Complaints	10 years after resolution
Marketing Consent	Until withdrawn, plus 3 years for compliance demonstration
Research Data	As specified in research protocol (typically 5-20 years)

9.2 After Retention Periods End

When retention periods expire, records are securely destroyed:

- Electronic records: Secure deletion with certification where appropriate
- Paper records: Confidential shredding by approved contractor
- Anonymized data may be retained indefinitely for statistical purposes

10. International Data Transfers

Your personal information is primarily processed and stored within the United Kingdom. However, there are limited circumstances where data may be transferred internationally.

10.1 Transfers to the European Economic Area (EEA)

The UK recognizes the EEA as providing adequate data protection. Transfers to the EEA are permitted without additional safeguards.

10.2 Transfers to Other Countries

I may transfer data outside the UK and EEA when:

- Treating international patients who require records in their country of residence
- Consulting with specialist colleagues based overseas
- Using IT service providers with servers outside the UK/EEA

10.3 Safeguards for International Transfers

When transferring data internationally to countries without an adequacy decision, I ensure protection through:

- UK International Data Transfer Agreement (IDTA) or Standard Contractual Clauses
- UK adequacy decisions recognizing countries with appropriate protections
- Your explicit consent where required
- Necessity for your medical treatment

Your Rights: You can request details of safeguards for any international transfer, obtain copies of transfer mechanisms, and object to international transfers in certain circumstances. Contact details in Section 2.

11. Data Security

I take the security of your personal information seriously and implement appropriate technical and organizational measures to protect it from unauthorized access, loss, or misuse.

11.1 Technical Measures

- Encrypted email for sensitive medical information
- Password-protected and encrypted electronic records systems
- Regular security updates and patches
- Secure backup systems
- Firewall and anti-virus protection
- Secure disposal of equipment containing data

11.2 Organizational Measures

- Staff training on data protection and confidentiality
- Confidentiality agreements with all staff and contractors
- Clear desk and screen policies
- Controlled access to records on a need-to-know basis
- Regular review of system access permissions
- Incident response procedures

11.3 Physical Measures

- Locked filing cabinets for paper records
- Secure premises with access controls
- Visitor management procedures
- Confidential shredding of paper records

11.4 Data Breach Response

In the unlikely event of a data breach that poses a risk to your rights:

- I will notify the Information Commissioner's Office within 72 hours where required by law
- I will notify you directly if the breach poses a high risk to you
- I will take immediate steps to mitigate the breach
- I will review and strengthen security measures to prevent recurrence

12. Your Rights

You have important rights regarding your personal information under UK data protection law. This section explains each right and how to exercise it.

12.1 How to Exercise Your Rights

To exercise any right:

- Contact me using details in Section 2 (mark correspondence "Data Protection Rights")
- I will acknowledge your request within 3 working days
- I will respond fully within one month (may extend to 3 months for complex requests)
- There is usually no charge unless requests are clearly unfounded or excessive

12.2 Right of Access (Subject Access Request)

You can request a copy of the personal information I hold about you. You will receive:

- Confirmation of what data I hold
- A copy of your data (usually electronic format)
- Information about how I use your data, who I share it with, and how long I keep it
- Details of your other rights

Healthcare-specific notes: Medical records may be withheld if disclosure would cause serious harm to your physical or mental health. Information about third parties may be redacted. I may request proof of identity.

12.3 Right to Rectification

You can ask me to correct inaccurate or incomplete information. I will correct factual errors in personal details (name, address, contact information). For medical records, I cannot delete or alter clinical entries, but I will add an addendum noting your concerns to maintain integrity and audit trail.

12.4 Right to Erasure ("Right to be Forgotten")

In limited circumstances, you can request deletion of your personal information. However, medical records generally cannot be deleted due to legal retention requirements and ongoing duty of care. I can refuse deletion when processing is necessary for healthcare provision, legal compliance, public health, or legal claims.

12.5 Right to Restriction of Processing

You can ask me to temporarily "pause" using your data while I verify accuracy (if you dispute it), when processing is unlawful but you don't want erasure, when I no longer need it but you need it for legal claims, or while verifying whether my grounds override your objection. Restriction may not apply to ongoing clinical care essential for your safety.

12.6 Right to Data Portability

You can receive certain data in portable format (e.g., PDF, CSV) or have it transferred to another provider, where processing is based on consent or contract and carried out by automated means. This typically applies to administrative data rather than full clinical notes.

12.7 Right to Object

You can object to processing based on legitimate interests. I must stop unless I demonstrate compelling grounds that override your rights, or processing is necessary for legal claims. You have an **absolute right** to object to marketing communications—I must stop immediately upon request.

12.8 Right Not to Be Subject to Automated Decision-Making

You have the right not to be subject to decisions made solely by computers that significantly affect you. I do not use automated decision-making for clinical or administrative decisions—all decisions are made by qualified healthcare professionals.

12.9 Right to Withdraw Consent

Where processing is based on consent (marketing, certain research, PHIN data sharing), you can withdraw it at any time. Withdrawal does not affect processing already completed or processing based on other legal grounds.

12.10 Right to Complain

If you're unhappy with how I've handled your data, you can complain to the Information Commissioner's Office (ICO):

Website: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

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

I encourage you to contact me first as many concerns can be resolved quickly through direct discussion. Making a complaint doesn't affect your right to pursue legal remedies through the courts.

13. National Data Opt-Out

The National Data Opt-Out allows you to opt out of your confidential patient information being used for research and planning purposes.

13.1 What It Covers

- Health and adult social care data for research and planning
- Does not affect your individual care and treatment

13.2 What It Doesn't Cover

- Information needed for your direct care
- Data for public health and safety
- Statutory reporting requirements

I will check and respect your National Data Opt-Out preference before sharing data for research or planning.

13.3 How to Set Your Preference

Online: www.nhs.uk/your-nhs-data-matters

Telephone: 0300 303 5678

Ask your GP practice

14. Cookies and Website Data

If you visit my website at www.bucks-spine.co.uk, information may be collected through cookies and similar technologies.

14.1 What Are Cookies?

Cookies are small text files stored on your device that help the website function and provide analytics.

14.2 Types of Cookies Used

- Essential cookies: Necessary for website functionality (e.g., session management)
- Analytics cookies: Help understand how visitors use the site
- Marketing cookies: Track visits across websites (if applicable)

You can control cookie settings through your browser. Blocking essential cookies may affect website functionality. Information submitted through website contact forms is handled in accordance with this Privacy Notice.

15. Changes to This Privacy Notice

I may update this Privacy Notice from time to time to reflect changes in law, regulation, my practices, new technologies, or feedback from patients and regulators.

15.1 How You'll Be Notified

- Material changes: Available on my website with updated "last updated" date
- Minor updates: Available on my website with updated "last updated" date
- Significant changes affecting rights: I will seek renewed consent where required by law

Current version: The latest version is always available at www.bucks-spine.co.uk/privacy-policy

Previous version: 22 May 2018

Current version: February 2026

Next scheduled review: February 2029

16. Questions and Concerns

If you have any questions about this Privacy Notice or how your information is used:

First point of contact: Amanda Rice (Practice Manager)

Email: amanda.rice@bucks-spine.co.uk

Telephone: 01844 273375

Data protection queries: Mark correspondence "Data Protection Query"

Complaints: See Section 12.10 for Information Commissioner's Office details

*I am committed to protecting your privacy and handling your information responsibly.
Your trust is essential to the care I provide.*

Document Control

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