



Privacy policy

At Complete Fertility Centre we collect and hold information about you to enable us to give you the correct care and treatment. The information will be kept as paper records, electronically (eg. in electronic patient records or digital images) or both. The information forms part of your health record and is kept to give you the most optimal treatment and to allow healthcare professionals involved at different stages of your care to have access to your medical history, such as allergies, operations or tests.

Our fundamental principle is that we are holding your records in strict confidence. All our staff are subject to a strict confidentiality code. Anyone who receives information from us also has a legal duty to keep it confidential.

Data Controller

General Data Protection Regulation 2018 requires every organisation that processes personal information to register as a Data Controller with the Information Commissioner's Office (ICO), apart from the instances when they are exempt. Complete Fertility Ltd is registered with the ICO as a data controller under registration reference ZA264458.

The Human Fertilisation and Embryology Authority (HFEA)

The HFEA licences our clinic to provide fertility treatment. They have specific rules and guidance around how we look after your records. All patients having an HFEA licensed treatment are asked to complete an HFEA Consent to Disclosure form (CD form). This allows you to say who we can and cannot disclose your fertility health care record to.

A pre-requisite of our HFEA licence is that we transfer specific licensed treatment data to the HFEA register via secure means. The HFEA holds your information in the strictest confidence in compliance with the HFE Act and the Data Protection Act. It is unlawful to carry out licensed treatments without sharing specific data with the HFEA.

Why we collect information about you

We aim to provide you with the highest quality of health care. To do this we must keep records about you, your health and the care we have provided or plan to provide to you.

What information might we hold about you?

These records may include:

- basic details about you, such as address, phone number, email address, date of birth, next of kin
- contact we have had with you such as appointments
- notes and reports about your health



- details and records about your treatment and care
- results of investigations such as ultrasound scans and laboratory test results
- relevant information from people who care for you and know you well, for example, other healthcare professionals.

The source of all information that we hold about you will either be directly from you, or from healthcare professionals or agencies that have come into contact with you. We do not access data about you from publicly accessible sources.

The lawful basis for processing your information

Health care records are classed as special category data which are more sensitive, so they require more protection. The conditions for processing special category data are listed in Article 9(2) of the General Data Protection Regulation.

Complete Fertility will only process personal data or special category personal data, where we have identified that a lawful basis for doing so is established under data protection legislation.

Purposes of processing	Lawful basis for processing
<ul style="list-style-type: none"> • To fulfil our obligations in carrying out licenced activity in regards to compliance with Human Fertilisation and Embryology Act 1990 and HFEA Code of Practice 9th Edition, 2018; with EUTCD (European Tissues and Cells Directive 2004/23/EC) and to other regulatory and professional requirements. 	<ul style="list-style-type: none"> • The processing is necessary for us to comply with regulatory and legal obligations
<ul style="list-style-type: none"> • To ensure our doctors, nurses and embryologists have all information necessary to make decisions on the best course of treatment for you. • To ensure a comprehensive record of your treatment at our clinic is available for you and the medical staff. • To expedite easy contact with you about the administrative aspects of care including invoices and other documents. • To fulfil our obligations arising from any contracts entered into between you and us and other administrative purposes. 	<ul style="list-style-type: none"> • The processing is necessary to perform a contract or enter into a contract with you.

<ul style="list-style-type: none"> • To allow you to participate in technological features of our service, if you wish to do it. • To contact you regarding a service you request or to respond to your communication to us. • To advise you about any changes in your treatment regime or in our service. • To contact you, if required, in relation to your treatment, a service you request or to respond to your communication to us. 	
<ul style="list-style-type: none"> • To carry out medical research and training for scientific and educational purposes 	<ul style="list-style-type: none"> • The processing is necessary to support our legitimate interests in managing our business (to deliver exceptional patient care provided our interests are not superseded by your interests and rights).
<ul style="list-style-type: none"> • To ensure that content from our website is presented in the best manner for you • To carry out verification and statistical analysis 	<ul style="list-style-type: none"> • The processing is necessary to support our legitimate interests in managing our business (to keep our records about you updated and to review how website users use our services) given that such interest are not overridden by your interests and rights.

Special Categories of Personal Data

Certain categories of personal data are regarded as “special” including health data (both physical and mental), biometric and genetic data, ethnic or racial origin and sexual orientation. We process your special data only where we have a legal basis e.g. with your explicit consent which you may withdraw at any time of your treatment.

How your records are used:

We use your records to:

- provide a solid basis for any treatment or advice we give to you
- make sure your treatment is safe, effective and based on the latest robust scientific evidence and to ensure the advice we provide is appropriate and relevant to you



- work effectively with others providing you with treatment or advice
- evaluate your care and properly investigate your concerns if you raise a complaint

We have a responsibility to:

- maintain full and accurate records of the care we provide to you
- keep records about you confidential, secure and accurate
- provide information in a format that is accessible to you (for example, in large type if you are partially sighted).

Members of the clinical teams providing your care may share your personal health information with each other. These teams may include:

- healthcare professionals (such as doctors, nurses, embryologists, healthcare assistants, pharmacists)
- operations and administrative support staff
- embryology, medical and nursing students in training
- pathology staff involved in the analysis and reporting of diagnostic tests
- staff conducting local clinical audits to evaluate the level of care provided to you.

All clinic staff are bound by law and a strict code of confidentiality. In accordance with ICO guidance, the clinic has appointed a Caldicott Guardian who is a senior member of staff responsible for protecting the confidentiality of patient and service user information and enabling appropriate information sharing.

The primary role of the appointed clinic data protection officer (DPO) is to ensure that their organisation processes the personal data of its staff, customers, providers or any other individuals (data subjects) in compliance with the applicable data protection rules.

We may share information about you with the following organisations for the purposes of delivering your care:

- HFEA (Human fertilisation and Embryology Authority), our regulatory body
- NHS commissioners of care – in particular, the organisation that referred you to us for treatment, assistance or advice (Clinical Commissioning Groups, hospitals)
- other providers involved in your care – such as your GP, or other NHS or private sector providers (for example, drugs delivery company)
- External health care auditors

We may also share your information with your consent and in accordance with strict sharing protocols about how it will be used, with:

- Medical and other scientific researchers
- local authorities and police (rarely and only in instances where there is a concern over your or others' safety)



- information for scientific research purposes in the Virtus Group, and with selected partners outside of the European Economic Area, in which case your data will be pseudonymised or anonymised.
- providers of technological support services (for example, but not limited to, Medi-Emo app, Fertility Consent, etc).

We may also share your information with your consent with others that need to use records about you to:

- verify the quality of treatment or advice we have given you
- protect the health of the general public
- help with investigation of any concerns or complaints you or your family have about your health care.

There may be times when we need to share your information without your consent, for example:

- where there is a risk of harm to you or other people
- where we believe that the reasons for sharing are so important that they override our obligation of confidentiality (for example, to support the investigation and prosecution of offenders or to prevent serious crime)
- where we are legally required to do so
- to control infectious diseases such as meningitis, tuberculosis (TB) or measles
- if you are subject to the Mental Health Act (1983), there are circumstances in which your 'nearest relative' must receive information even if you object.

How long we keep your records

- The regulatory authority HFEA stipulates how long we must keep records relating to fertility treatment.
- Records will be kept in a manner that ensures access for at least 30 years after use or disposal of your gametes or embryos. After 30 years your record may be destroyed by shredding or deleting. However, any records containing donor gamete information should never be discarded.
- If you saw us for appointments that did not result in the use or storage of your gametes, then your health record must be retained for a minimum of 8 years in line with the Retention Schedules Records Management Code of Practice for Health and Social Care

<https://digital.nhs.uk/media/1159/Retention-schedules-Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016/xls/RMCOP-retention-schedules>

Your rights regarding your information

Under the General Data Protection Regulation (GDPR) individuals have:

- The right to be informed



- The right of access (to have a copy of your treatment records)
- You have a right to have your data rectified if it is inaccurate or incomplete.
- The right to erasure ('the right to be forgotten') but please be aware it does not apply in certain cases (for example, where the processing is necessary to comply with a legal obligation or for the establishment, exercise or defence of legal claims).
- You have a right to restrict processing of your data in certain circumstances.
- The right to data portability
- The right to object to processing of personal data
- Rights in relation to automated decision making, including profiling

Sending data outside the European Union (EU) or European Economic Area (EEA)

- Your personal data may be transferred to and stored at a destination outside the EU or European Economic Area ("EEA") for the purposes described above.
- Complete Fertility is a subsidiary of group of companies based in Australia. In some instances it may be necessary to share personal data with them or their representatives for insurance and risk management purposes.
- It may also be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers including those in the USA. Such staff may be engaged in the processing of your request for information via the website and the provision of support services.
- To a limited extent necessary to transfer personal data outside of the EEA, we will check appropriate safeguards are in place to protect the privacy and integrity of such personal data. If you need information about such safeguards, please contact our DPO, Data Protection Officer at info@completefertility.co.uk

Security

Complete Fertility will take all reasonable steps to ensure that your personal data is treated securely and in accordance with this Privacy Policy. Where we have given you (or where you have chosen) a password which enables you to communicate with us electronically (for example, by email) it is your responsibility to keep this password confidential. We request that you not to share a password with anyone. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted via email; any transmission is entirely at your own risk. Upon the receipt of your personal data at Complete Fertility, we will use robust security procedures in attempt to prevent any unauthorised access.

Information we hold about you for marketing purposes

If you would like to join our e-marketing database that is used specifically to send you news about the clinic, its service and treatments, our events and any promotions, you will need to double opt in via our website and then by a confirmation email. Your first name, last name and email address will be stored in our e-marketing service, MailChimp, who are committed to achieving compliance with the GDPR.

You can unsubscribe from our emails at any time. We will delete any individual subscribers upon their request and, we will not penalise anyone who wishes to withdraw their consent. An unsubscribe option is automatically included in the footer of every campaign sent through MailChimp. We also include a preferences link in the footer of many emails to meet the right of access requirement.

We collect information from you when you visit our website and request an appointment, sign up to attend an event, or send a general enquiry. When completing an online form you are asked to enter your name, telephone number, email address and other information. The information we collect through our forms may be used in the following ways:

- To personalise your experience;
- To administer a promotion, survey or other site feature;
- To contact you via telephone or by email with relevant information relating to your form fill, for example an event reminder that you have expressed interest in, a follow up and further relevant information to an enquiry that you have expressed interest in;
- To evaluate the success of our marketing efforts.

The data you submit in an online request form is stored in a customer relationship tool, called Salesforce. Salesforce is committed to supporting us on our GDPR compliance.

The data may also be kept in a password protected secure spreadsheet. These spreadsheets are only accessible to staff working in Administration, Marketing and the Donor Team.

The data you submit in an online feedback form is kept in a password protected secure spreadsheet, accessible only to staff working in Quality Control.

Our website, www.completefertility.co.uk, is encrypted to provide secure hosting to ensure any data submitted is secure.

Adverse incidents

If any of your information is disclosed inappropriately at any point whilst we are in possession of it, depending on the severity of the exposure, we would consider this an adverse incident and declare it to the ICO and to the HFEA. We would contact you to let you know about the incident and what we are doing to investigate and resolve it.



Making a complaint

If you wish to make a complaint about any aspect of how your health records have been kept by us you may do so by contacting our Complaints Officer via 02381 20 6980 or info@completefertility.co.uk . If you wish to complain to a supervisory authority you may contact the Human Fertilisation and Embryology Authority or the Information Commissioners Office.

You have a right to request a copy of your records at any time during your care. Information must be provided to you within 1 month of the request. Please contact our administration office on 02381206980 for further details. We may request proof of identification to verify your request.