

# Shrewsbury Family Chiropractic customer privacy notice

**Registered name:** Travelling Kiwis Limited

We are the controller of your personal data. For more information on controllers and their responsibilities please see our guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with [your](#) personal information.

## Contact details

**Post:** Shrewsbury Family Chiropractic, Willow House East, Sitka Drive, Shrewsbury Business Park, Shrewsbury, SY2 6LG, GB

**Telephone:** 01743 588 190

**Email:** [hello@shrewsburyfamilychiropractic.co.uk](mailto:hello@shrewsburyfamilychiropractic.co.uk)

## Who this notice applies to

This privacy notice applies to adults, children and young people receiving care, and to parents or people with parental responsibility where we hold their contact or related information.

Where a patient is under 18, personal information will usually be managed with the involvement of a parent or person with parental responsibility, unless the young person is able to make their own decisions about their care. We aim to explain how information is used in a clear and age-appropriate way where relevant.

## What information we collect, use, and why

We collect or use the following information **to provide patient care, services and related goods**:

- Name, address and contact details
- Gender
- Date of birth
- NHS/HSC/CHI number
- Hospital number
- Next of Kin details including any support networks
- Emergency contact details
- Photographs
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, medication and dietary requirements and general care provisions)
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)

- Payment details (including card or bank information for transfers and direct debits)
- Insurance policy details
- Call recordings

We also collect the following special category information **to provide patient care, services and related goods**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following information **for safeguarding or public protection reasons**:

- Name, address and contact details
- NHS/HSC/CHI number
- Hospital number
- Emergency contact details
- Photographs
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)

We also collect the following special category information **for safeguarding or public protection reasons**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information **for patient app or portal functionality**:

- Names and contact details
- Addresses
- Medical history
- Payment details
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We also collect the following special category information **for patient app or portal functionality**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information **to comply with legal requirements**:

- Name
- Contact information
- Health and safety information
- Financial information
- Insurance details
- Tax information
- Safeguarding information

We also collect the following special category information **to comply with legal requirements**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information **for information updates, marketing or market research purposes**:

- Names and contact details
- Marketing preferences
- Records of consent, where appropriate

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Purchase or service history
- Call recordings
- Witness statements and contact details
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect the following special category information **for dealing with queries, complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Health information

## Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)

- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](#).
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing](#).
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability](#).
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent](#).

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **to provide patient care, services and related goods** are:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** - we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Provision of patient care. We collect and use personal information under the lawful basis of legitimate interests in order to provide safe, appropriate, and effective chiropractic care. This includes maintaining accurate clinical records, understanding a person's health history and current concerns, communicating with patients about their care, coordinating referrals or investigations where appropriate, and ensuring continuity and quality of care over time. Processing this information benefits patients directly by enabling informed clinical decision-making, tailoring care to individual needs, monitoring progress, and reducing the risk of harm. It also supports public and professional interests by helping us meet expected standards of clinical practice, safeguarding responsibilities, and quality assurance obligations. In some circumstances, it also enables us to respond appropriately to concerns about patient safety or wellbeing. We only collect and use information that is relevant and necessary for these purposes. Access to personal information is restricted to authorised staff and service providers who need it to support patient care, and appropriate technical and organisational measures are in place to protect confidentiality and security. Information is retained only for as long as necessary in line with professional, legal, and regulatory requirements. The use of personal information for these purposes is unlikely to cause harm or distress, as patients would reasonably expect a healthcare provider to process such information in order to deliver care. Patients' rights and interests are not overridden, as they are provided with clear information about how their data is used, can ask questions or raise

concerns at any time, and can exercise their data protection rights in accordance with the law. We have balanced our legitimate interests against the rights and freedoms of individuals and are satisfied that this processing is proportionate, necessary, and fair, and that it supports the delivery of high-quality, patient-centered care.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for safeguarding or public protection reasons** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Safeguarding and public protection. We collect and use personal information under the lawful basis of legitimate interests where this is necessary to safeguard patients, protect vulnerable individuals, or prevent harm to the individual or others. This includes identifying, assessing, and responding to concerns relating to safety, wellbeing, capacity, neglect, abuse, or serious risk. Processing this information is necessary to support appropriate safeguarding action, enable proportionate information sharing with relevant professionals or agencies where required, and ensure that concerns about risk or harm are addressed responsibly. This processing benefits individuals by helping to protect their health, safety, and welfare, and supports wider public protection by reducing the risk of harm to others. We only collect and use information that is relevant and necessary for safeguarding purposes, and we take care to limit access to authorised individuals who have a legitimate need to know. Information is handled sensitively, shared only where appropriate, and in line with applicable safeguarding guidance, professional standards, and legal requirements. The use of personal information for safeguarding purposes is something individuals would reasonably expect from a healthcare provider. While this processing may involve sensitive information, the potential risks to privacy are outweighed by the need to protect individuals from serious harm. Where possible and appropriate, individuals are informed about safeguarding actions taken, unless doing so would increase the risk of harm or undermine the purpose of the safeguarding activity. We have balanced our legitimate interests against the rights and freedoms of individuals and are satisfied that this processing is proportionate, necessary, and fair, and that it prioritises the safety and wellbeing of those involved without placing our own interests above theirs.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an

urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for patient app or portal functionality** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Patient app / portal functionality. We collect and use personal information under the lawful basis of legitimate interests to operate and support our patient app and electronic systems in a way that is efficient, secure, and supportive of patient care. This includes enabling patients to complete digital forms, manage appointments, communicate with us, make payments, and access relevant information related to their care. Processing personal information in this way benefits patients by improving accuracy, reducing administrative burden, minimizing delays, and supporting continuity of care. It also benefits our practice by allowing us to manage records securely, reduce the risk of error, and maintain appropriate audit trails, which in turn supports patient safety and service quality. We only process information that is necessary for the functioning, security, and administration of our digital systems. Access to personal information is restricted to authorised individuals and trusted service providers who require it to support these functions, and appropriate technical and organisational measures are in place to protect confidentiality and data security. The use of personal information for patient app and portal functionality is something individuals would reasonably expect when engaging with a modern healthcare practice. The processing involved is proportionate and low risk, and does not override individuals' rights or freedoms. Patients are provided with clear information about how their data is used, can raise questions or concerns, and can exercise their data protection rights in accordance with the law. We have balanced our legitimate interests against the rights and freedoms of individuals and are satisfied that this processing is necessary, fair, and proportionate, and that it supports efficient and secure access to care without placing our own interests above those of patients.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information **for information updates, marketing or market research purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Information updates and marketing. We collect and use personal information under the lawful basis of legitimate interests to provide existing patients with relevant information updates and communications about our services. This includes practice updates, service information, and occasional reminders or communications intended to support continued engagement with care. This processing benefits patients by helping them stay informed about services they have previously used or expressed an interest in, and by supporting continuity of care and awareness of available support. It also benefits our practice by enabling us to communicate efficiently with patients in a way that is proportionate, relevant, and expected in the context of an ongoing professional relationship. We limit the personal information used for these purposes to basic contact details and recorded communication preferences. We do not use sensitive or special category data, profiling, or intrusive tracking for marketing purposes. Communications are sent only to individuals who have an existing relationship with us, and we ensure that clear opt-out options are provided in every communication so individuals can easily change their preferences or stop receiving updates at any time. The potential impact on individuals' privacy is low, as the communications are limited, relevant, and respectful of preferences. Individuals would reasonably expect a healthcare practice they have attended to provide such updates, and their rights and interests are not overridden. We have balanced our legitimate interests against the rights and freedoms of individuals and are satisfied that this processing is fair, necessary, and proportionate, and does not place our own interests above those of the people we support.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Queries, complaints and claims. We collect and use personal information under the lawful basis of legitimate interests in order to receive, assess, investigate, and respond appropriately to queries, complaints, and claims. This includes reviewing relevant records, correspondence, and factual information so that concerns can be addressed fairly, accurately, and in a timely manner. Processing this information benefits individuals by ensuring that concerns are taken seriously, investigated properly, and responded to transparently. It also supports accountability, learning, and service improvement, and enables us to protect patients, staff, and the practice where allegations, disputes, or claims arise. We limit the information used for these purposes to what is relevant and necessary to understand the issue raised and to reach a fair outcome. Access to information is restricted to authorised individuals and, where appropriate, to insurers, legal advisers, or regulatory bodies who require

it to support the resolution of the matter. Information is handled confidentially and in line with professional, legal, and regulatory requirements. Individuals would reasonably expect a healthcare practice to use relevant personal information when dealing with queries, complaints, or claims arising from their care or interactions with the practice. While this processing may involve sensitive information, the potential impact on privacy is proportionate and outweighed by the need to resolve concerns properly, protect the rights of all parties, and maintain trust and accountability. We have balanced our legitimate interests against the rights and freedoms of individuals and are satisfied that this processing is necessary, fair, and proportionate, and that it does not place our own interests above those of the people involved.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

## Where we get personal information from

- Directly from you
- Family members or carers
- Other health and care providers
- Insurance companies
- We do not obtain personal information from any additional sources beyond those listed above.

## How long we keep information

We retain personal information for different periods depending on the type of information and the purpose for which it is held. Clinical records are retained in line with professional guidance issued by the General Chiropractic Council and applicable legal and regulatory requirements. In most cases, clinical records are retained for at least 8 years following the last episode of care, in line with professional guidance. Financial and accounting records are retained in accordance with HMRC requirements. Information relating to complaints, claims, and safeguarding is retained for as long as necessary to meet legal, regulatory, and professional obligations. Personal information is securely deleted or anonymised when it is no longer required.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

## Who we share information with

### Data processors

#### **Apple iCloud**

This data processor does the following activities for us: Cloud storage and device backup services provider, consumer and small business technology sector. Apple iCloud may be used to store or back up limited practice information such as documents, emails, or device data where Apple devices are used. Any personal information stored is protected by device and account security controls and processed in accordance with Apple's data protection terms.

#### **Chiropractic Leadership Alliance – CLA Insight**

This data processor does the following activities for us: Chiropractic analytics and reporting platform, professional services and healthcare analytics sector, United States of America. CLA Insight provides analytical and reporting tools that allow us to review practice activity, outcomes, and operational metrics. Where personal information is processed, this is done on our behalf to support practice management, service improvement, and professional development.

#### **Cura Law**

This data processor does the following activities for us: Legal services provider specialising in healthcare and professional regulation, legal services sector, United Kingdom. Cura Law provides legal advice and support in relation to professional practice, regulatory compliance, and risk management. Personal information may be processed on our behalf where necessary to provide legal advice or representation.

#### **Dropbox**

This data processor does the following activities for us: Cloud file storage and sharing services provider, technology sector. Dropbox may be used to store and share administrative or clinical documents securely. Personal information is processed on our behalf in accordance with our instructions and applicable data protection requirements.

#### **GoCardless**

This data processor does the following activities for us: Direct debit payment processing provider, financial technology sector, United Kingdom. GoCardless processes direct debit payments on our behalf. Personal and bank account information is processed securely to enable recurring or one-off payments in line with our instructions.

#### **Google (Google Workspace / Google Drive)**

This data processor does the following activities for us: Cloud storage, email, and productivity services provider, technology sector. Google services may be used for secure email communication and storage of administrative documents. Personal information is processed on our behalf in accordance with our instructions and Google's data protection commitments.

#### **Perfect Patients**

This data processor does the following activities for us: Healthcare marketing and patient communication platform, digital marketing services sector, United States of America. Perfect Patients provides tools to support patient communications, reminders, and engagement. The service processes contact information and communication preferences on our behalf in accordance with our instructions and applicable marketing and data protection requirements.

#### **PostureScreen (PostureCo)**

This data processor does the following activities for us: Posture and movement analysis software provider, digital health and clinical assessment sector, United States of America. PostureScreen provides software used to capture and analyse posture and movement images as part of clinical assessment. The platform processes photographs and related health information on our behalf to support assessment, progress monitoring, and patient education.

#### **PracticeHub**

This data processor does the following activities for us: Healthcare practice management software provider (electronic medical records and patient portal), health technology sector, Gibraltar (covered by UK adequacy regulations). PracticeHub provides our

electronic practice management system, including electronic clinical records, patient intake forms, appointment management, patient communications, and secure storage of personal and health information. The system enables patients to complete forms digitally and supports the day-to-day administration and delivery of care. PracticeHub processes personal information on our behalf in accordance with our instructions and applicable data protection requirements.

### **Stewart Associates (SALTD)**

This data processor does the following activities for us: Accounting and tax advisory services provider, financial and professional services sector, United Kingdom. Stewart Associates provides accounting, tax, and financial advisory services. Personal and financial information is processed on our behalf to meet statutory accounting, tax, and reporting obligations.

### **Stripe**

This data processor does the following activities for us: Payment processing service provider, financial technology sector, United Kingdom and United States operations. Stripe processes card payments securely on our behalf. Payment information is handled using encrypted systems and tokenisation, and we do not store full card details on our own systems. Stripe processes personal and financial information strictly to enable payment transactions.

### **SumUp**

This data processor does the following activities for us: Card payment processing provider, financial technology sector, United Kingdom and European operations. SumUp provides card payment processing services, primarily as a contingency payment option. Personal and payment information is processed securely to complete transactions on our behalf.

### **3D Net Medical**

This data processor does the following activities for us: Clinical imaging and digital health services provider, medical technology sector, United States of America. 3D Net Medical provides digital health and imaging-related services used to support clinical assessment and record-keeping. Personal and health information is processed on our behalf where required to deliver these services.

### **United Chiropractic Association (UCA)**

This data processor does the following activities for us: Professional membership and support organisation, professional association sector, United Kingdom. The United Chiropractic Association provides professional support, guidance, and member services. In limited circumstances, personal information may be processed on our behalf in relation to professional advice, support queries, or governance matters, in line with applicable data protection requirements.

### **WebExercises**

This data processor does the following activities for us: Healthcare exercise prescription and patient education platform, digital health sector, United States of America. WebExercises provides a digital platform that allows us to create, manage, and share personalised exercise and rehabilitation programmes with patients. The service processes limited personal and health information on our behalf to enable patients to access prescribed exercises and educational materials securely.

## **Others we share personal information with**

- Other health providers (eg GPs and consultants)
- Insurance companies, brokers and other intermediaries
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Professional advisors
- Organisations we're legally obliged to share personal information with

## Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or
- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the [Public Benefit and Privacy Panel for Health and Social Care](#) or other similar governance and scrutiny process.

## Sharing information outside the UK

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

**Organisation name:** Apple iCloud

**Category of recipient:** Cloud storage and device backup services provider

**Country the personal information is sent to:** United States of America

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** Chiropractic Leadership Alliance – CLA Insight

**Category of recipient:** Chiropractic analytics and reporting platform

**Country the personal information is sent to:** United States of America

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** Dropbox

**Category of recipient:** Cloud file storage and sharing services provider

**Country the personal information is sent to:** United States of America

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** GoCardless

**Category of recipient:** Direct debit payment processing provider

**Country the personal information is sent to:** European Economic Area

**How the transfer complies with UK data protection law:** The country or sector has been assessed as providing adequate protection (UK adequacy regulations)

**Organisation name:** Google (Google Workspace / Google Drive)

**Category of recipient:** Cloud storage, email, and productivity services provider

**Country the personal information is sent to:** United States of America

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** Perfect Patients

**Category of recipient:** Healthcare marketing and patient communication platform

**Country the personal information is sent to:** United States of America

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** PostureScreen

**Category of recipient:** Digital health software provider (exercise prescription / clinical assessment)

**Country the personal information is sent to:** United States of America

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** PracticeHub

**Category of recipient:** Healthcare practice management and electronic medical records software provider

**Country the personal information is sent to:** Gibraltar (covered by UK adequacy regulations)

**How the transfer complies with UK data protection law:** The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

**Organisation name:** Stripe

**Category of recipient:** Payment processing and financial technology provider

**Country the personal information is sent to:** United States of America

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** SumUp

**Category of recipient:** Card payment processing provider

**Country the personal information is sent to:** European Economic Area / United States of America

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** 3D Net Medical

**Category of recipient:** Clinical imaging and digital health services provider  
**Country the personal information is sent to:** United States of America  
**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** WebExercises  
**Category of recipient:** Digital health software provider (exercise prescription / clinical assessment)  
**Country the personal information is sent to:** United States of America  
**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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

**Helpline number:** 0303 123 1113

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