Holly Cottage Chiropractic Clinic
Patient Privacy Notice

Version: 2.0
Last updated: 12 October 2026

1. Introduction

At Holly Cottage Chiropractic Clinic, we take the privacy and confidentiality of your personal information seriously.

To provide safe, appropriate and effective healthcare, we need to collect and use certain information about you. This includes your contact details, medical history, health information and records of the care you receive.

This notice explains what information we collect, why we collect it, how it is used and protected, who it may be shared with, and your rights under data protection law.

It applies to patients receiving chiropractic and dietetic services at Holly Cottage Chiropractic Clinic.

We process personal information in accordance with applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Who is responsible for your information?

Holly Cottage Chiropractic Clinic Limited is the data controller responsible for determining how and why your personal information is processed.

Data Controller: Holly Cottage Chiropractic Clinic Limited

Registered and Clinic Address:
58 Birmingham Road
Sutton Coldfield
B72 1QJ

ICO Registration Reference: Z1446955

Data Protection Officers: Trine Hansen and Sarah Hawkesworth

Telephone: 0121 321 1755
Email: admin@hollycottagechiropractic.co.uk

If you have questions about how your information is handled or wish to exercise your data protection rights, please contact the clinic using the details above.

3. What information do we collect?

We collect personal information that is relevant to providing healthcare and managing our services.

This may include:

Personal and contact information
- Your name, address, date of birth and contact details.
- Emergency contact information where provided.
- Parent or guardian details where appropriate.
- Appointment history and administrative information.
- Payment and billing records.
- Communication preferences.

Health and clinical information
- Your medical history and current symptoms.
- Relevant medical conditions, medication and previous treatment.
- Findings from clinical assessments and examinations.
- Clinical notes, diagnoses or working diagnoses.
- Treatment plans, advice and recommendations.
- Information about your response to treatment and ongoing progress.
- Reports, referrals and correspondence from other healthcare professionals.
- Relevant information about physical activity, lifestyle, diet and nutrition.

Health information is classified as special category personal data under UK GDPR and is subject to additional legal protection.

We aim to collect only the information reasonably necessary for the purposes described in this notice.

4. How do we obtain your information?

Most information is collected directly from you when you:

- Register as a patient.
- Complete a medical history or consent form.
- Book or attend an appointment.
- Discuss your health with a clinician.
- Contact the clinic by telephone, email or another communication method.
- Provide updates about your health or treatment.

We may also receive relevant information from other healthcare professionals, including GPs, consultants or other practitioners involved in your care.

Where appropriate, information may be provided by a parent, guardian, carer or authorised representative.

5. Why do we use your information?

We use your personal information for the following purposes.

Providing healthcare

To understand your health concerns, carry out clinical assessments, provide chiropractic or dietetic care, develop treatment plans, monitor progress and make appropriate clinical decisions.

Maintaining clinical records

To maintain accurate records of consultations, examinations, treatment, advice and other information relevant to your care.

Managing appointments

To arrange appointments, provide confirmations and reminders, communicate changes and manage the clinic's appointment schedule.

Clinic administration

To manage payments, respond to enquiries, maintain administrative records and support the day-to-day operation of the clinic.

Professional and legal responsibilities

To meet applicable legal obligations, professional standards, safeguarding requirements and clinical recordkeeping responsibilities.

Quality and safety

To review concerns, investigate complaints, support clinical governance and maintain the quality and safety of our services.

6. Our lawful basis for processing your information

Under UK GDPR, we must have a lawful basis for collecting and using personal information.

Depending on the purpose, we may rely on:

Article 6(1)(b) — Contract

Where processing is necessary to provide healthcare services you have requested or to take steps before providing those services.

Article 6(1)(c) — Legal obligation

Where processing is necessary to comply with applicable legal requirements.

Article 6(1)(f) — Legitimate interests

Where processing is necessary for legitimate clinic purposes, such as appropriate administration, security or service management, provided these interests are not overridden by your rights and freedoms.

Article 6(1)(a) — Consent

Where we specifically ask for your consent for an optional activity, such as receiving marketing communications.

Because we process health information, we must also satisfy an additional condition under Article 9 of UK GDPR.

For information used to provide healthcare, we generally rely on Article 9(2)(h), which permits processing necessary for medical diagnosis, the provision of health or social care or treatment, or the management of healthcare services, subject to applicable confidentiality safeguards.

Other lawful bases and special category conditions may apply in particular circumstances, including legal claims or safeguarding matters.

Consent to receive healthcare treatment is separate from consent to process personal information under data protection law. We do not ordinarily rely on data protection consent to maintain clinical records necessary for providing healthcare.

7. How do we store and protect your information?

Holly Cottage Chiropractic Clinic uses Jane App, a practice management system, to manage patient appointments, electronic clinical records and related administrative information.

Patient records created since our transition to digital recordkeeping in 2019 are maintained electronically.

We also securely retain historical paper clinical records created before the transition to digital systems.

We take appropriate steps to protect patient information, including:

- Restricting access to authorised members of the clinic team.
- Maintaining professional confidentiality.
- Using appropriate access controls for electronic records.
- Allowing clinicians to access Jane App remotely through authorised devices.
- Securely storing historical paper records.
- Taking appropriate steps to protect information handled by external service providers.

Access to patient information is limited to those who require it for legitimate clinical or administrative purposes.

8. Appointment reminders and communication preferences

We use Jane App to manage appointments and send SMS appointment reminders.

To provide this service, we use relevant contact information, including patients' mobile telephone numbers and necessary appointment details.

Patients can indicate their communication preferences through our registration and consent forms.

These preferences can be updated by contacting the clinic.

We aim to respect patients' communication preferences while maintaining appropriate communication about their care and appointments.

9. Marketing communications

Holly Cottage Chiropractic Clinic does not routinely send marketing or promotional communications to patients.

Our patient consent forms include a separate, optional opt-in for receiving marketing materials should we offer these communications in the future.

We will only send electronic marketing communications where we have an appropriate lawful basis and comply with applicable electronic marketing rules.

Patients who have opted in can withdraw their marketing consent at any time by contacting the clinic or using any unsubscribe facility provided.

Choosing not to receive marketing communications will not affect the healthcare services you receive.

10. Who might we share your information with?

We treat patient information as confidential and do not share it unnecessarily.

Where appropriate and lawful, information may be shared with:

Healthcare professionals

Your GP, consultant or another healthcare professional where sharing is relevant to your care and is permitted by applicable confidentiality and data protection requirements.

Authorised clinic staff and clinicians

Members of the Holly Cottage team who need access to relevant information to provide care or manage the clinic.

Practice management and service providers

Jane App and relevant providers supporting its services, including appointment management, electronic records and SMS communications.

Professional, regulatory or legal bodies

Where disclosure is required or permitted by law, including relevant regulatory investigations, legal proceedings or other professional obligations.

Safeguarding and emergencies

Where disclosure is necessary and lawful to protect someone from serious harm or meet safeguarding responsibilities.

Confidential document disposal providers

Specialist providers engaged to securely collect and destroy historical paper records when they are no longer required.

We only share information that is reasonably necessary for the relevant purpose.

We do not sell patient personal information.

11. International transfers of personal information

Holly Cottage Chiropractic Clinic uses Jane App to manage patient records and appointments.

Patient records held within Jane App's UK data region are stored on servers located in the United Kingdom.

Certain services, including SMS appointment reminders, involve limited personal information being processed by third-party providers outside the UK, including in the United States.

Jane App states that clinical chart information is not shared with its third-party messaging providers.

Where personal information is transferred internationally, appropriate safeguards are required under UK data protection legislation. Jane App's published data protection arrangements describe the transfer mechanisms and safeguards it uses, including applicable adequacy arrangements and contractual protections.

Patients may contact the clinic for further information about international processing and the safeguards that apply.

12. How long do we keep your information?

We retain clinical records in accordance with applicable legal requirements and professional guidance.

Our standard clinical record retention periods are:

Adult patients

Clinical records are retained for eight years from the date of the patient's last appointment.

Children and young people

Clinical records are retained until the patient's 25th birthday, or until their 26th birthday if they were 17 when their treatment ended.

These retention periods apply to clinical records held for both chiropractic and dietetic services.

In certain circumstances, records may need to be retained for longer, including where legal proceedings, complaints or other legal or professional requirements make this necessary.

Other administrative and financial information is retained for periods appropriate to its purpose and applicable legal requirements.

Electronic clinical records are managed through Jane App. We take appropriate steps to review and securely dispose of records when their retention periods expire and there is no continuing reason to retain them.

Historical paper records are collected and securely destroyed by a specialist confidential document disposal company.

13. Your rights under data protection law

Under UK GDPR, you have rights relating to your personal information. Some rights are subject to conditions or legal exemptions.

Right to be informed

You have the right to understand how and why your personal information is collected and used.

Right of access

You can request access to the personal information we hold about you, including your clinical records.

Requests can be made verbally or in writing.

We will respond without undue delay and normally within one month, subject to any permitted extension or adjustment to the response period.

Access requests are normally free of charge.

We may request reasonable information to verify your identity before releasing confidential information.

Right to rectification

You can ask us to correct inaccurate personal information or complete information that is incomplete.

Where a clinical record contains a professional opinion or historical account that you disagree with, we may need to preserve the original entry while recording your concerns or adding an appropriate clarification.

Right to erasure

In certain circumstances, you can request the deletion of your personal information.

However, this right is not absolute. We may be required to retain clinical records for legal, professional or other lawful purposes.

Right to restrict processing

You may be entitled to ask us to restrict how certain information is used.

Right to object

You may have the right to object to processing based on legitimate interests.

You have the right to object to your personal information being used for direct marketing.

Right to data portability

In certain circumstances, you may be entitled to receive information you have provided to us in a structured, commonly used and machine-readable format.

Right to withdraw consent

Where we rely on your consent for a particular activity, you can withdraw that consent at any time.

Withdrawing consent does not affect processing already carried out lawfully or information we must continue to retain under another lawful basis.

To exercise your rights, please contact the clinic using the details provided in Section 2.

14. Children's personal information

We provide healthcare services to both adults and children.

Where a patient is a child, we collect and process information necessary for their care, with appropriate safeguards.

Parents or individuals with parental responsibility may be involved in providing information and making decisions where appropriate.

However, children's confidentiality, developing capacity and individual rights must also be respected.

Requests for access to a child's clinical records will be considered in accordance with applicable law, the child's capacity and relevant confidentiality requirements.

15. Automated decision-making

Holly Cottage Chiropractic Clinic does not use solely automated decision-making systems to make decisions about patients that have legal or similarly significant effects.

Clinical assessment, diagnosis and treatment decisions are made by appropriately qualified healthcare professionals.

16. How to raise a concern or complaint

If you have questions or concerns about how your personal information is handled, please contact our Data Protection Officers.

Trine Hansen and Sarah Hawkesworth
Holly Cottage Chiropractic Clinic Limited
58 Birmingham Road
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B72 1QJ

Telephone: 0121 321 1755
Email: admin@hollycottagechiropractic.co.uk

We will take your concerns seriously and aim to resolve them appropriately.

You also have the right to raise a complaint with the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

Information Commissioner's Office
Website: https://ico.org.uk
Telephone: 0303 123 1113

17. Changes to this notice

We review this notice periodically and update it where necessary to reflect changes in legislation, professional requirements or how the clinic handles personal information.

The latest version will be available on the Holly Cottage Chiropractic Clinic website.

Printed copies are available on request from reception.

Where significant changes affect how we use your personal information, we will take appropriate steps to inform patients.

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