

ALS Group privacy notice - Public

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Owner: Louise Charlesworth

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Document Control

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0.1	Initial draft		09/2022
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Document context

ALS Dental has duties under Articles 13 and 14 of the UK General Data Protection Regulation to provide a range of information to any individual whose personal data we process.

The text on the following pages constitutes the privacy notice for ALS Dental clients and their patients, fulfilling our statutory obligations and giving colleagues an understanding of how ALS Dental processes their data and of their rights.

Your personal data at ALS Dental

To deliver first-class dental manufacturing services, ALS Dental must process certain personal data related to individuals.

ALS Dental (Amalgamated Laboratory Solutions Limited, of 85 Great Portland Street, London, W1W 7LT, company number 11021690) is the controller for the uses of personal data outlined in this document and will hereafter be referred to as “we”, “us” or “the organisation”.

Our Data Protection Lead can be contacted at

dataprotection@als-dental.com

This privacy notice is for the general public and in particular:

- Owners and staff of our client dental practices;
- The patients of those practices whose data we use to provide dental laboratory services, such as manufacturing and repairing dentures, crowns and bridges, implants, prosthetics and orthodontics and any other dental products as required.

When appropriate we will provide extra information to cover any additional processing activities not mentioned in this document. Your personal information will also be processed in accordance with ALS policies and procedures, and this is explained further below where relevant.

Your rights

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner

You have the right to:

- be informed about the collection and use of your personal data;
- access personal data held about you and receive a copy;
- have factual inaccuracies in your personal data rectified;

- in certain limited circumstances, restrict the processing of your data or to have personal data erased, or to ask for data portability;
- object to how your personal data is being processed.

You can find independent advice about personal data rights provided by the Information Commissioner's Office: <https://ico.org.uk/your-data-matters/>

For more information on how to exercise any of these rights, please contact the Data Protection Lead (see details above).

Sources of your personal data

We normally receive information about individuals from client dental practices and occasionally directly from a patient (for example, if they visit a laboratory for shade taking or in those labs who provide denture repair services to the public)

Visitors to our laboratories may also be videoed on CCTV

Our lawful basis for processing your personal data

We process personal data principally where necessary to our legitimate interests to run a dental laboratory business and delivering services. (UK GDPR Article 6(1)(f))

In some cases, for example for regulatory reasons, we are under a legal obligation to process personal data (UK GDPR Article 6(1)(c)).

We process narrowly defined health data relating to patients (including relevant details of dental health and requirements for dental devices) as this is necessary for the provision of health care and for the management of health systems and services (UK GDPR Article 9(2)(h)).

The personal data we process and why

We process the following types of information relating to dentist clients and staff in dental practices:

- Name, contact details, job role, employing business.

- Instructions received and other relevant business communications such as emails and notes of telephone calls.

We process the following types of information relating to the patients of our client dental practices:

- Name or identification number
- Oral images, casts or scans
- Details of dental device requirements
- Details of aesthetic requirements (for example, shading)
- Comments and feedback on dental devices
- (Where relevant) age and gender

We process personal data:

- For the provision of dental laboratory services
- For billing, accountancy, quality assurance and other administrative tasks
- For marketing (business to business only)

How long we keep your data

Under the Medical Device Regulations, we are required to retain details of our work on dental devices for ten years before confidentially destroying them.

Recipients of your personal data

To manage our services, personal data may be held on externally hosted IT systems such as our laboratory and financial systems.

In normal circumstances we will not disclose patient or client personal data outside ALS Dental. The exceptions to that would be where due to a safeguarding, patient safety or fraud concern, ALS Dental was obliged to disclose relevant records to the General Dental Council, NHS counter-fraud services or other regulatory or law enforcement bodies.

All our staff are subject to a contractual duty of confidentiality and to the General Dental Council *Standards for the dental team*: <https://www.gdc-uk.org/standards-guidance/standards-and-guidance/standards-for-the-dental-team>

If you believe that ALS Dental has failed to manage your personal data appropriately, you have the right to complain to the statutory regulator - The Information Commissioner's Office

You can telephone them on 0303 123 113

Or you can use their online tool for reporting concerns:

<https://ico.org.uk/concerns/>

Or you can write to them at:

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