

Privacy Policy

Seren Dental — serendental.co.uk

Last updated: 24 August 2026

Note for internal review (delete before publishing): This is a drafted template, not legal advice. Please have it checked by a solicitor or your indemnity provider before it goes live, and complete every item in square brackets. Items flagged [CHECK] need verifying before publication.

1. About this policy

This policy explains how Seren Dental collects, uses, shares and protects personal information, and what rights you have over that information. It applies to patients, prospective patients, website visitors, people who contact us, referring clinicians, job applicants and visitors to the practice.

We are committed to protecting your privacy and to handling your information in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations, and the professional duty of confidentiality owed by our clinicians under General Dental Council standards.

2. Who we are

[Registered company name], trading as Seren Dental, is the **data controller** for the information described in this policy.

- **Address:** 40 Wellfield Road, Penylan, Cardiff, CF24 3YR
- **Company number:** [company number]
- **Telephone:** 02921 681868
- **Email:** info@serendental.co.uk
- **ICO registration number:** [ICO number]

Our data protection lead is [name / job title], contactable at [email address] or at the practice address above. [CHECK — a dental practice of this size is unlikely to need a statutory Data Protection Officer, but you must name someone responsible. Confirm who this is.]

3. The information we collect

Information you give us directly — when you enquire, book, register as a patient or attend an appointment:

- name, date of birth, address, telephone number, email address

- emergency contact and, where relevant, next of kin or the details of a parent, guardian or carer
- your GP's details and, where relevant, your previous dentist
- payment and billing details
- correspondence with us, including enquiry forms, emails, WhatsApp messages and notes of telephone calls

Health information (special category data) — the clinical record we are professionally required to keep:

- your medical history, including medications, allergies and relevant conditions
- dental history, examination findings, diagnoses, treatment plans, estimates and consent records
- clinical photographs, radiographs (X-rays), intraoral scans and other imaging
- notes of treatment provided, materials used, sedation records and aftercare given
- referrals to and reports from other clinicians
- information about failed or cancelled appointments

Information collected automatically when you use our website — IP address, browser and device type, pages visited, time on site and referring source, collected through cookies and similar technologies. See section 8.

Other information — where applicable: records of complaints and how they were resolved, CCTV footage of the practice premises [**CHECK — delete if you do not operate CCTV; if you do, you need signage and a separate retention period**], and recruitment information from job applicants.

4. Where we get your information from

Most information comes directly from you. We may also receive information from:

- a dentist or doctor referring you to us
- a specialist or laboratory involved in your care
- a parent, guardian, carer or family member acting on your behalf
- your GP, where we need to check something about your medical history (with your knowledge)
- our online booking platform, where you book through it
- publicly available sources, where you have made contact through social media

5. Why we use your information, and our lawful basis

What we use it for	Lawful basis (UK GDPR Article 6)	Additional basis for health data (Article 9)
Providing dental care, diagnosis and treatment	Contract, and legitimate interests	Art. 9(2)(h) — provision of health care and treatment by a professional subject to a duty of confidentiality
Keeping accurate clinical records	Legal obligation, and legitimate interests	Art. 9(2)(h)
Managing appointments, reminders and recalls	Contract	Art. 9(2)(h)
Taking payment, invoicing and credit control	Contract, and legal obligation	Not applicable
Handling complaints and, if needed, defending claims	Legitimate interests, and legal obligation	Art. 9(2)(f) — establishment, exercise or defence of legal claims
Meeting regulatory duties (GDC, HIW, safeguarding, RIDDOR, ionising radiation regulations)	Legal obligation	Art. 9(2)(h) and 9(2)(g)
Audit, quality assurance and clinical governance	Legitimate interests	Art. 9(2)(h)
Responding to enquiries you send us	Legitimate interests	Art. 9(2)(h), where your enquiry includes health information
Sending marketing and practice updates	Consent, or legitimate interests where you are an existing patient	Consent, where the content relates to a health condition
Using clinical photographs in marketing or teaching	Consent	Explicit consent
Website analytics and improving the site	Consent (via cookie banner)	Not applicable
Security of the premises [if CCTV]	Legitimate interests	Not applicable
Recruitment	Legitimate interests, and steps prior to	Not applicable

What we use it for	Lawful basis (UK GDPR Article 6)	Additional basis for health data (Article 9)
entering a contract		

Where we rely on **legitimate interests**, we have considered whether our interest is overridden by your rights, and have concluded it is not. You can ask us for details of that assessment.

Where we rely on **consent** — for example for marketing emails, or for the use of your photographs — you can withdraw it at any time. Withdrawing consent does not affect anything we did before you withdrew it, and it does not affect the clinical record we are required to keep.

6. Appointment reminders and recalls

We will contact you about your appointments and about routine recalls by [SMS, email and/or telephone] using the contact details you give us. These messages are part of providing your care rather than marketing. Please tell us if you would prefer a particular method, or if a particular method is not safe or private for you.

7. Marketing

We will only send you marketing about treatments, offers and practice news where you have asked us to, or where you are an existing patient and we are telling you about similar services — and in both cases only where you have not opted out.

Every marketing message includes a way to unsubscribe. You can also opt out at any time by emailing info@serendental.co.uk or telling reception. Opting out of marketing will not affect your care or your appointment reminders.

We will never sell your information to anyone, and we do not share it with third parties for their own marketing.

8. Cookies and website analytics

Our website uses cookies and similar technologies. Strictly necessary cookies, which make the site work, are set automatically. Analytics, performance and marketing cookies are only set with your consent, given through the cookie banner, and you can change your choice at any time via [link to cookie settings]. **[CHECK — confirm the site has a working consent banner that blocks non-essential cookies until consent is given, and that the analytics and social media tools actually in use are listed below.]**

We currently use: [Google Analytics / Google Tag Manager / Meta Pixel / other — list each, what it does and how long the cookie lasts].

Our website is hosted on [hosting provider], and our online booking is provided by [booking platform provider], both of which set their own cookies.

9. Who we share your information with

We share information only where it is necessary, and only with organisations that are required to keep it confidential:

- **Dental laboratories and technicians** making crowns, dentures, aligners or other appliances
- **Specialists and other clinicians** we refer you to, or who refer you to us, and your GP where relevant to your care
- **NHS Wales bodies or your health board**, where any part of your care involves them
- **Our practice management, imaging and communications software providers**, who process data on our behalf
- **Our online booking platform**, [provider name]
- **Payment processors and, where you use a payment plan, the finance provider** — subject to their own privacy policies
- **Our indemnity provider, insurers and legal advisers**, where there is a complaint or claim
- **Our accountants and, where necessary, debt recovery agents**
- **Regulators and authorities** — including the General Dental Council, Healthcare Inspectorate Wales, the Information Commissioner's Office, safeguarding teams, the police or courts — where we are legally required or permitted to do so
- **Anyone you ask us to share with**, such as a family member or carer

Where a supplier processes information on our behalf, we have a written contract requiring them to protect it and to use it only on our instructions.

10. Transfers outside the UK

Your information is normally stored within the UK or the European Economic Area. Some of our software or communications providers may store or access data outside the UK.

Where that happens, we make sure it is protected by an adequacy decision, by the International Data Transfer Agreement or UK Addendum, or by another safeguard permitted by law.

Please note that WhatsApp and social media platforms are operated by third parties who may transfer data internationally under their own terms. **[CHECK — confirm which of your suppliers transfer data overseas and name them here.]**

11. How long we keep your information

We keep dental records for as long as we are professionally required to. In broad terms:

- **Adult patients:** for at least 11 years from the date of the last entry [**CHECK — confirm against the NHS Wales Records Management Code of Practice and your indemnity provider's current guidance; some providers advise longer**]
- **Patients under 18:** until their 25th birthday, or 11 years from the last entry, whichever is longer
- **Enquiries that do not lead to registration:** [12 months]
- **Marketing consents and opt-outs:** for as long as we send marketing, plus a record of your opt-out indefinitely so we do not contact you again
- **Financial records:** 6 years plus the current financial year, as required by HMRC
- **CCTV:** [31 days] [**delete if not applicable**]
- **Unsuccessful job applications:** [6 months]

When information is no longer needed, we delete or securely destroy it.

12. How we protect your information

We take the security of your information seriously. Our measures include access controls and individual logins for clinical software, encryption of devices and backups, secure disposal of paper records and imaging, staff training in confidentiality and data protection, and written agreements with our suppliers.

Please be aware that **email and WhatsApp are not fully secure**. If you send us clinical details or images through those channels, you do so at your own risk. Tell us if you would prefer a different method.

13. Your rights

You have the right to:

- **Be informed** about how we use your information — this policy
- **Access** a copy of the information we hold about you (a subject access request). We will respond within one month and will not normally charge
- **Rectification** — have inaccurate information corrected. Note that a clinical record is a historical record: if you disagree with a clinical opinion recorded in it, we will add a note of your view rather than delete the original entry
- **Erasure** in some circumstances — this right is limited where we are required by law or professional obligation to keep clinical records
- **Restrict** how we use your information while a concern is being resolved
- **Object** to processing based on legitimate interests, and to direct marketing at any time
- **Data portability** for information you gave us where we rely on consent or contract
- **Withdraw consent** at any time, where consent is the basis we rely on
- **Not be subject to automated decision-making**. We do not make any decisions about you by automated means, and we do not carry out profiling

To exercise any of these rights, contact [name / job title] at [email address] or write to the practice address. We may need to confirm your identity first. If you are asking on behalf of someone else — for example a child or a relative — we will need evidence of your authority to do so.

14. Children

Where a patient is under 16, we normally take instructions from a parent or person with parental responsibility. A young person who is competent to make their own decisions may exercise their own rights, and may ask that information is not shared with their parents. We will handle those situations in line with our safeguarding and confidentiality obligations.

15. Complaints

If you are unhappy with how we have handled your information, please tell us first — contact [name / job title] at [email address] — so we can try to put it right. Our full procedure is in our Complaints Policy.

You also have the right to complain directly to the **Information Commissioner's Office**:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Telephone 0303 123 1113 — ico.org.uk

Complaints about the standard of your dental care, rather than about your information, can be raised with the **General Dental Council** (gdc-uk.org) or, for privately funded treatment, the **Dental Complaints Service** on 020 8253 0800.

16. Changes to this policy

We may update this policy from time to time. The date at the top shows when it was last revised. Where changes are significant, we will bring them to your attention.

17. Contact us

Seren Dental 40 Wellfield Road, Penylan, Cardiff, CF24 3YR 02921 681868
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