

# VICI Dental - Data Protection Policy

#### 1. Introduction

VICI Dental is committed to ensuring the privacy and security of personal data collected, processed, and stored in the course of our dental practice operations. This Data Protection Policy outlines the principles and practices we adhere to in compliance with the General Data Protection Regulation (GDPR) and other relevant data protection laws in the United Kingdom.

#### 2. Data Controller and Data Protection Officer

VICI Dental, located at 25 Albion Place, Leeds, LS1 6JS is the data controller responsible for the processing of personal data. Our appointed Data Protection Officer (DPO) for VICI Dental is Dr. Ricky Duggal.

### 3. Types of Personal Data Collected

VICI Dental collects and processes personal data for the purpose of providing dental services. This may include, but is not limited to, patient contact details, medical history, treatment plans, and financial information. We may also process data related to our employees and other individuals in the course of our business operations.

#### 4. Lawful Basis for Processing

We ensure that personal data is processed lawfully, fairly, and transparently. The lawful basis for processing may include the necessity of processing for the performance of a contract, compliance with a legal obligation, protection of vital interests, consent, the performance of a task carried out in the public interest or the exercise of official authority, and legitimate interests pursued by VICI Dental or a third party.

#### 5. Data Minimisation

VICI Dental collects only the personal data that is strictly necessary for the intended purpose of processing. We ensure that data is not retained for longer than necessary and is regularly reviewed for deletion when no longer required.

### 6. Data Security

We implement appropriate technical and organisational measures to ensure the security of personal data. This includes safeguards against unauthorised or unlawful processing, accidental loss, destruction, or damage.

### 7. Data Subject Rights

Individuals have the right to access, rectify, erase, restrict processing, and object to the processing of their personal data. VICI Dental will respond to such requests within one month, and the process for exercising these rights is outlined in our Privacy Policy.

### 8. Data Breach Response

In the event of a data breach, VICI Dental will promptly assess the risk to individuals' rights and freedoms. If the breach poses a high risk, we will notify the Information Commissioner's Office (ICO) and affected individuals without undue delay.

# 9. Data Protection Impact Assessments (DPIA)

VICI Dental conducts DPIAs for high-risk processing activities, assessing the necessity, proportionality, and compliance with data protection requirements.

#### 10. Data Transfer

Any transfer of personal data outside the UK or the European Economic Area (EEA) will only be done in compliance with data protection laws, ensuring adequate safeguards are in place.

# 11. Policy Review

This Data Protection Policy is regularly reviewed to ensure ongoing compliance with data protection laws and reflects any changes in our data processing activities.

## 12. Contact Information

For any questions or concerns regarding data protection at VICI Dental, please contact our Data Protection Officer Dr. Ricky Duggal at 25 Albion Place, Leeds, LS1 6JS.

Thank you for entrusting us with your data.