



Rose Clinic Bray

Specialists in Menopause & Women's Health

24. Data Protection Policy

Rose Clinic Bray Ltd ("we," "us," "our") is committed to protecting the privacy and security of your personal data in compliance with GDPR and the Irish Data Protection Act 2018.

A. Data We Collect

We collect and process the following types of data:

- Personal Information: Name, address, date of birth, contact details.
 - Health Information: Medical history, test results, prescriptions.
 - Administrative Information: PPSN, billing details, insurance information.
 - Communication Records: Emails, phone calls, or other interactions with us.
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B. Purpose of Data Collection

We process your data to:

- Provide medical care and maintain accurate records.
 - Manage appointments and communications.
 - Conduct clinical audits and quality assurance (if applicable).
 - Comply with legal and regulatory obligations.
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C. Legal Basis for Processing

- Healthcare Services: Article 6(1)(e) and Article 9(2)(h) GDPR.
 - Legal Obligations: Article 6(1)(c) GDPR.
 - Consent: For specific purposes like clinical audits or training.
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D. Data Sharing

We may share your data with:

- Healthcare professionals involved in your care.
- Third-party service providers, such as software providers or laboratories.
- Regulatory authorities as required by law.

All third parties must adhere to strict data protection agreements.



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E. Patient Communication & Email Security

We use Google Workspace with enforced TLS encryption and an additional encryption plugin (Virtru) to enhance email security.

How We Use Email for Patient Communication

- Email may be used to send test results and appointment-related information.
- Patients are asked to confirm their email address before test orders/blood samples are taken.
- A note is documented in the patient's file confirming consent and verification of their email address.

Limitations of Email Security & Patient Consent

- While we use TLS encryption and Virtru for enhanced security, email is not 100% secure.
 - Patients will be informed of the risks and can opt out of email communication if they prefer and have their results collected in person.
 - Sensitive information is only shared using encryption, and unencrypted emails will not include detailed medical results.
 - Patients must notify us if they wish to change or remove their email from our system.
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F. Data Retention

We retain patient data in accordance with Irish healthcare regulations:

- Adult Patients: Records retained for 8 years after the last visit.
- Child Patients: Records retained until the child's 25th birthday.
- Maternity Patients: Records retained for 25 years after the birth of the last child.
- Deceased Patients: Records retained for 8 years after the date of death.

These retention periods ensure compliance with regulatory obligations and support the provision of safe and effective care.

G. Data Security

We implement strict security measures, including:

- Secure email practices (TLS encryption, Virtru for added security, and 2-step verification for staff email access).
- Controlled access to data by authorized personnel only.
- Secure storage of physical and electronic records.
- Regular staff training on data protection and cybersecurity.



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H. Data Breach Policy

If a suspected or actual data breach occurs (e.g., an email is misdirected), we will:

1. Investigate the breach and assess the risk to patient data.
2. Notify affected individuals if necessary.
3. Report to the Data Protection Commission (DPC) if required under GDPR.

I. Your Rights Under GDPR

Under GDPR, you have the right to:

- ✓ Access: Request a copy of your data.
- ✓ Rectification: Correct inaccuracies.
- ✓ Erasure: Request deletion of your data, where permissible.
- ✓ Restriction: Limit how your data is processed.
- ✓ Portability: Receive your data in a portable format.
- ✓ Objection: Object to specific processing.
- ✓ Complaint: Contact the Data Protection Commission (DPC) if you have concerns.

To exercise your rights, contact us (details below).

J. Contact Details

If you have questions or concerns about your data, please contact our Data Protection Officer (DPO):

- ✉ Dr. Aoife Nic Shamhráin
- ✉ Email: info@roseclinicbray.ie
- ☎ Phone: (01) 276 1522
- 📍 Address:

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K. Updates to This Policy

We may update this policy to reflect changes in regulations or operations. Please review it periodically.