

Client Privacy Notice

LAST REVIEWED	8 April 2026
CONTROLLER	PHC Clinics Ltd · Registered in England and Wales
REGULATION	UK GDPR · Data Protection Act 2018

This privacy notice describes how PHC Clinics Ltd collects, uses, shares and otherwise processes your personal data in connection with your use of our Services. Please read it carefully to understand our practices and how we will treat your information.

For information about how we process your data when you use our website, please refer to our separate Website Privacy Notice at www.phcclinics.com.

1. Who We Are

PHC Clinics Ltd is the data controller responsible for your personal data ('PHC', 'we', 'us', 'our'). We are registered with the Care Quality Commission (CQC) and operate in accordance with the UK General Data Protection Regulation ('UK GDPR') and the Data Protection Act 2018 ('DPA 2018').

CONTACT Concierge@phcclinics.com · 1 Redhouse Way, Swindon, SN25 2AY

2. Personal Data We Collect

We collect different categories of personal data depending on which of our Services you use:

- **Identity Data** — your full name, title, date of birth, gender and marital status.
- **Contact Data** — billing address, home address, email address and telephone numbers.
- **Financial Data** — payment card details (processed securely via our payment provider).
- **Transaction Data** — details of Services and Products purchased from us.
- **Profile Data** — purchases, interests, preferences, feedback and survey responses.
- **Marketing & Communications Data** — your preferences for receiving marketing from us and your communication choices.

— **Health Data** — physical and mental health information, medical history, wellness goals, test results, medication details, appointment notes, GP details, treatment feedback and outcome information.

SPECIAL CATEGORY DATA: Health data is 'special category' data under UK GDPR and is afforded the highest level of protection. We process this data only with your explicit consent or where otherwise permitted by law.

3. How We Collect Your Data

3.1 Directly from You

You provide data directly to us when you purchase our Services or Products, complete our pre-appointment questionnaire, book an appointment, contact us by telephone, email or social media, subscribe to our publications, or participate in a competition, promotion or survey.

3.2 Automated Technologies

When you use our Website, we may automatically collect technical and usage data through cookies and similar technologies. Please refer to our Cookie Policy for details.

3.3 Third Parties

We may receive data about you from referral practitioners, diagnostic laboratories, and analytics and platform providers such as Hiveality.

4. How We Use Your Data

- **Providing Services** — delivering your personalised programme, managing appointments and communicating with you about your care.
- **Processing Transactions** — processing payments for Services and Products.
- **Clinical Records** — maintaining accurate clinical records as required by our regulatory obligations.
- **Improving Services** — analysing how our Services are used to make continuous improvements.
- **Marketing** — sending you information about our Services where you have consented or where we have a legitimate interest to do so.
- **Legal Compliance** — complying with our legal and regulatory obligations, including CQC requirements.

5. Legal Bases for Processing

- Contract: processing necessary to provide our Services to you
- Legal obligation: compliance with CQC and other regulatory requirements

- Legitimate interests: improving our Services, fraud prevention, business administration
- Explicit consent: processing of special category health data and direct marketing

6. Sharing Your Data

We may share your personal data with:

- **Our practitioners and clinical team** — for the purpose of delivering your personalised programme.
- **Third-party specialists** — where we refer you for services beyond our scope.
- **Service providers** — including IT, payment processing and platform providers (e.g. Hiveality) acting as data processors on our behalf.
- **Regulatory authorities** — including the CQC, where required by law.
- **Professional advisors** — including lawyers, accountants and insurers.

We do not sell your personal data to third parties.

7. Data Retention

We retain your personal data only for as long as necessary for the purposes for which it was collected, including to satisfy legal, regulatory and clinical record-keeping obligations. Clinical records are retained for a minimum of eight years following your last contact with us, or longer where required by law.

8. Your Rights

Under UK GDPR, you have the right to: access the personal data we hold about you; request correction of inaccurate data; request erasure in certain circumstances; restrict our processing of your data; receive your data in a portable format; object to processing based on legitimate interests or for direct marketing; and withdraw consent where processing is based on consent. To exercise any of these rights, please contact us at Concierge@phclinics.com. We will respond within one calendar month.

9. Changes to This Notice

We may update this Privacy Notice from time to time. Updates will be published with a revised 'Last Reviewed' date. Where required, we will notify you of material changes.

10. Contact & Complaints

EMAIL Concierge@phclinics.com

ADDRESS 1 Redhouse Way, Swindon, SN25 2AY

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www.ico.org.uk · Tel: 0303 123 1113
