

Annex A - RECORD KEEPING IN OUR PRACTICE

Name of Controller: Barnham Optical LTD

Address of Controller: 1 The Square, Barnham, Bognor Regis, West Sussex, PO22 0HB

Telephone/Email: 01243 554091 / Tony@barnhamopticians.co.uk

Responsible person: Category of personal data and data subject	Legal basis for processing personal data	Who these personal data are shared with	Time limits for erasure	Technical/organisational security measures to ensure level of security appropriate to risks
Patient records – including retinal photographs, referral letters etc.	Legitimate interest and for the purposes of current and continuing eye health care, general health and vision correction.	Registered health care professionals and those under their supervision	College of Optometrists guidance is that it is best practice for records to be kept for 10 years. https://guidance.college-optometrists.org/guidance-contents/knowledge-skills-and-performance-domain/patient-records/data-protection-act-1998/	Only registered health care staff have access to the complete patient record. All registered staff comply with GOC standards, which ensure they respect patient confidentiality. Paper records are kept securely. Electronic data is password protected and encrypted, employees can only access the information essential for their role, all employees have passwords so there is an audit of any changes made, there is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.
Customer records – e.g. direct debit/payment details	Legitimate interest	The data subject's bank	Kept for tax purposes and future claims/information	Paper records are kept securely. Electronic data is password protected and encrypted, employees can only access the information essential for their role and receive appropriate training for their role. All employees have passwords so there is an audit of any changes made, there is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.
Customer records – e.g. orders for goods where minimal personal id is used to ensure any customer order is processed properly	Legitimate interest	Glazing companies as part of the process of manufacturing and fitting lenses into frames. Contact Lens suppliers.	Kept for tax and VAT purposes and future claims and/or information. To comply with taxation regulation. Invoices with personal data are held for 6 years from the end of the last company financial year they relate to or longer if: <ul style="list-style-type: none"> they show a transaction that covers more than one of the company's accounting periods the company has bought something that it expects to last more than 6 years, like equipment or machinery 	Paper records are kept securely. Electronic data is password protected and encrypted, employees can only access the information essential for their role and receive appropriate training for their role. All employees have passwords so there is an audit of any changes made, there is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date. Invoices with personal data is destroyed by shredding after seven years to comply with taxation regulation All suppliers are asked to sign a confidentiality agreement with Barnham Optical Limited to ensure confidentiality and data

			<ul style="list-style-type: none"> • you sent your Company Tax Return late • HMRC has started a compliance check into your Company Tax Return <p>https://www.gov.uk/vat-record-keeping</p> <p>https://www.gov.uk/running-a-limited-company/company-and-accounting-records</p>	processing is done according the Data Protection Regulations and GDPR.
People who email us to make enquiries	Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject (Note that this condition is not available to processing carried out by public authorities in the performance of their tasks).	Registered health care professionals and those under their supervision including receptionists and administrative assistants staff.	2 years unless the person emailing makes an appointment for an eye examination when the data may be transferred to their medical records and data is processed in accordance with patient records above	If paper records of emails are made they are not kept and destroyed by shredding. Electronic data is password protected, employees can only access the information essential for their role and receive appropriate training for their role. All employees have passwords so there is an audit of any changes made, there is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date. We will monitor any emails sent to us, including file attachments for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. We will report to the relevant authorities any content that is in breach of the law.
People who make a complaint to us	Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject (Note that this condition is not available to processing carried out by public authorities in the	Senior management and Registered health care professionals and those under their supervision including receptionists and administrative assistants staff as required in order to deal with the complaint	2 years after the complaint is closed.	Paper records are kept securely. Electronic data is password protected and encrypted, employees can only access the information essential for their role and receive appropriate training for their role. All employees have passwords so there is an audit of any changes made, there is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date.

	performance of their tasks)			
Staff records – includes bank details, NI number, and other personal information	Performance of a contract with the data subject or to take steps to enter into a contract and processing is necessary for carrying out obligations as an employer	HR (including payroll) and senior management only	Kept for tax and VAT purposes and future claims and/or information. To comply with taxation regulation. Invoices with personal data are held for 6 years from the end of the last company financial year they relate to or longer if : <ul style="list-style-type: none"> • they show a transaction that covers more than one of the company's accounting periods • you sent your Company Tax Return late HMRC has started a compliance check into your Company Tax Return https://www.gov.uk/vat-record-keeping • https://www.gov.uk/running-a-limited-company/company-and-accounting-records 	Paper records are kept securely. Electronic data is password protected and encrypted, employees can only access the information essential for their role and receive appropriate training for their role. All employees have passwords so there is an audit of any changes made, there is also a back-up system that means data can be restored. All anti-virus software and other software are kept up to date
CCTV Internal use only	Legitimate interest and for the purposes of creating a safe and secure environment for employees and for visitors to the Company's business premises, such as clients, customers, contractors and suppliers, and to protect the Company's property.	Internal use only	1 Week	Complex password protected device.