



IRON INFUSIONS UK

Privacy Policy

Humber Medical Limited trading as Iron Infusions UK

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This policy explains how we use and protect personal information when you visit our website, contact us, book an appointment or receive care. It also explains your information rights and how to raise a concern.

Who is responsible for your information

Humber Medical Limited, trading as Iron Infusions UK, is the data controller. We decide why and how personal information is used for our service. Our company is registered in England and Wales under number 16842366. Our registered office is 71-75 Shelton Street, Covent Garden, London WC2H 9JQ.

Our Information Commissioner's Office registration reference is ZC100845. Dr David Cavanagh is our Information Governance Lead and the contact for privacy questions. This role is distinct from a statutory Data Protection Officer appointment.

For privacy questions or requests, email info@humbermedical.co.uk, or write to the Information Governance Lead at 71-75 Shelton Street, Covent Garden, London WC2H 9JQ.

Information we collect and where it comes from

- Identity and contact information, such as your name, date of birth, address, telephone number, email address and information needed to confirm your identity.
- Health information, including symptoms, medical history, medicines, allergies, relevant pregnancy information, test results, assessments, consent, prescriptions, treatment, observations, adverse reactions, referrals and follow-up.
- Administrative information, including enquiries, appointments, communications, invoices, payment status, feedback and complaints. We may also record communication needs, reasonable adjustments and authorised representatives.
- Website and technical information, such as an IP address, browser or device information and security logs, where collected by the website or its service providers.

We usually obtain information from you. Where necessary and lawful, we may also receive it from your GP, referrer, laboratory, pharmacy, other treating professional, emergency or safeguarding service, or a person authorised to act for you. We use only information relevant to the purpose.

Why we use information and our lawful bases

We follow the UK GDPR, the Data Protection Act 2018 and applicable confidentiality law, including changes made by the Data (Use and Access) Act 2025. Health information needs both an Article 6 lawful basis and an additional Article 9 condition.

Purpose	Usual lawful basis
Arrange requested care and provide assessment, diagnosis, treatment and follow-up	Article 6(1)(b), taking requested steps before a contract or performing it. For health information, Article 9(2)(h), healthcare, with the professional confidentiality safeguards and the relevant Data Protection Act 2018 condition.
Meet specific legal duties, maintain required records and make required disclosures	Article 6(1)(c), legal obligation. For health information, Article 9(2)(h) for healthcare records, or another applicable Article 9 condition where a specific legal disclosure requires it.
Clinical governance, audit, complaints, service security and administration	Article 6(1)(f), our legitimate interests in safe care, quality, security and effective service management, balanced against your rights. Article 9(2)(h) applies where health information is needed to manage healthcare.
Establish, exercise or defend legal claims	Article 6(1)(f), legitimate interests in handling legal claims, and Article 9(2)(f) where health information is necessary.
Optional marketing or another optional use based on consent	Article 6(1)(a), consent. If an optional use requires health information, a suitable Article 9 condition, including explicit consent under Article 9(2)(a) where appropriate, is also required.

For safeguarding or an emergency, we identify the particular lawful basis and health-data condition that applies. This may include a legal obligation, an applicable safeguarding condition, or vital interests where the legal conditions are met. We record why any disclosure is necessary.

Consent to treatment is separate from the data-protection basis for using information. Withdrawing treatment consent does not automatically require us to erase a clinical record. Where we rely on data-protection consent, you may withdraw it at any time without affecting the lawfulness of earlier use.

Who may receive your information

Authorised clinicians and administrators access information only as needed for their role. We use Semble as our clinical record system. Approved providers of clinical software, hosting, IT support, booking, communications, payments, secure storage or confidential disposal may process information for us under appropriate safeguards. A payment provider may also have its own privacy notice for processing it controls.

Where needed for your care, we may share relevant information with your GP, referrer, laboratory, pharmacy, hospital or another treating professional. We explain proposed sharing and respect your wishes in line with confidentiality law. We do not give family members, employers or insurers access simply because they request it.

We may share the minimum necessary information with emergency or safeguarding services, regulators, courts, professional advisers, indemnity providers or an eligible complaints reviewer where you authorise it or another lawful basis permits or requires it. A serious safety risk or legal requirement may justify disclosure without your agreement. We tell you where appropriate and lawful.

How long we keep information

- Adult clinical records are normally kept for at least eight years after the last entry or contact. Clinically relevant booking records, correspondence and results follow the clinical-record period.
- Complaints, incidents, adverse reactions and related investigations are normally kept for at least ten years after closure.
- Financial, tax, contract and billing records are normally kept for at least six years from the end of the relevant financial year or contract.
- Other enquiries, routine administrative material and technical records are kept only as long as needed for their purpose or the applicable record category.

A longer period may be necessary for ongoing care, safeguarding, a complaint, a claim, a regulatory matter or another documented legal need. We review information before disposal and securely destroy, delete or anonymise it when it is no longer required. Protected backup copies are removed through the approved backup lifecycle.

Keeping information secure

We use proportionate access controls, staff confidentiality arrangements, approved communication methods, secure storage and backup arrangements. We check identity and authority before disclosing records. Please contact us for a secure way to send clinical documents and do not send payment-card security codes or unnecessary sensitive information in an ordinary email.

Cookies and marketing choices

Cookies and similar technologies can store information on your device or support website functions. We use technologies that are strictly necessary for a service you request where legally permitted. Where consent is required for optional analytics, advertising or other tracking, we will explain the purpose and obtain your choice before using it. Refusing optional tracking must not prevent access to an essential enquiry or care route.

You can ask us about the technologies used by the website and how to change your choices. Your browser also provides controls for cookies; blocking essential cookies may affect some functions. A general acceptance of this policy is not consent to optional tracking or marketing.

Optional electronic marketing is separate from appointment and care communications. Where we rely on consent, you can withdraw it using the unsubscribe route in a message or by contacting us. We will not use your clinical information for optional marketing without the additional permission required by law.

Automated tools and information you need to provide

Clinical suitability, prescribing and treatment decisions are made by an authorised clinician. A website enquiry or results-navigation tool does not diagnose you, prescribe treatment or make an automated decision about eligibility. Please avoid entering names or other identifiers into a tool that asks only for an illustrative result.

Accurate identity, contact and relevant health information is needed to assess and treat you safely. If essential information is unavailable, we may need to defer care or arrange another route. Information requested for an optional purpose can be declined without affecting your care.

Your information rights

Depending on the circumstances, you may ask to access or receive a copy of your information, correct inaccuracies, erase information, restrict its use, object to processing based on legitimate interests, or receive certain information in a portable form. You may withdraw consent where that is the basis for processing. These rights have legal conditions and exceptions; for example, we may need to retain an accurate clinical record or protect another person's confidentiality.

Requests can be made verbally or in writing and do not require a special form. We may need proportionate identity or authority checks. We normally respond without undue delay and within one month. For complex or numerous requests, the law may allow up to two further months; we explain any extension within the initial month. We explain any applicable lawful pause, limitation or refusal and your complaint rights. Access is normally free of charge.

Privacy concerns and complaints

Contact the Information Governance Lead using the details above if you are concerned about our handling of information or need help making a complaint. We aim to acknowledge a complaint within three working days and will do so no later than 30 calendar days after receipt. We investigate and explain the outcome without undue delay, keeping you informed if more time is needed.

You also have the right to complain to the Information Commissioner's Office. Information about raising concerns is available at <https://ico.org.uk/make-a-complaint/>. Our internal process does not remove that right.

Changes and accessible copies

We review this policy when our services, systems or legal requirements change. The date above identifies the current version. We provide further information before a materially different use where required. Contact us for a copy in another accessible format.