# Privacy Policy

The Row Dental | Last updated: 9 October 2026

## 1. Introduction

At The Row Dental, we are committed to protecting your privacy and handling your personal information with care, transparency and confidentiality. This policy explains how we collect, use, store and protect personal data when you visit our practice, use our website, enquire about services or receive dental treatment. We process personal information in accordance with UK GDPR, the Data Protection Act 2018 and other applicable legislation.

Data controller: G46Consulting Limited, registered in Scotland under company number SC645745.

Practice address: The Row Dental, 31 Albany Street, Edinburgh. Email: info@therowdental.com. ICO registration: ZB439014.

## 2. Information We Collect

### Personal and contact information

- Name, date of birth, address, telephone number and email
- Emergency contacts
- Appointment history and communication preferences

### Medical and dental information

- Medical and dental histories, medication, allergies and relevant medical conditions
- Examination findings, diagnoses, treatment plans and clinical notes
- Radiographs, CBCT scans, digital impressions and clinical photographs
- Consent documentation, correspondence, prescriptions and aftercare

### Financial information

- Estimates, invoices, payments, deposits and refunds
- Information needed to arrange third-party finance

### Website and marketing information

- Website forms, enquiries and social media messages
- Marketing preferences, consent records, website usage and cookie preferences

We collect information reasonably necessary for the purposes described in this policy.

## 3. How We Collect Your Information

- When you enquire, book or attend an appointment
- When you complete registration or medical history forms
- When you communicate with our team, make payments or arrange finance

- When you subscribe to marketing, provide feedback or use our website

We may also receive relevant information from referring dentists, other healthcare professionals, laboratories and specialist providers involved in your care.

## 4. How We Use Your Information

- Provide dental care, assessments, treatment plans and aftercare
- Maintain clinical records and communicate with healthcare professionals
- Manage bookings, reminders, payments and accounts
- Respond to enquiries, feedback and complaints
- Meet legal, regulatory and professional obligations
- Improve service quality and safety
- Send marketing communications where legally permitted

We do not sell your personal information.

## 5. Our Lawful Basis for Processing Information

Depending on the circumstances, we rely on contract (Article 6(1)(b)) to provide services; legal obligation (Article 6(1)(c)) to comply with applicable requirements; legitimate interests (Article 6(1)(f)) for proportionate practice administration and security; consent (Article 6(1)(a)) for activities such as certain marketing; and vital interests (Article 6(1)(d)) in emergencies.

### Special category health information

For processing necessary to provide dental care, we generally rely on Article 9(2)(h) UK GDPR, subject to professional confidentiality requirements. Other conditions may apply, including explicit consent for certain uses of imagery and Article 9(2)(f) for legal claims. Consent to dental treatment is separate from consent to process personal data.

## 6. Clinical Records and Confidentiality

We maintain confidential clinical records, including histories, notes, radiographs, photographs, scans, prescriptions and correspondence, to support safe and continuous care. Records are maintained using Dentally. Access is restricted to authorised team members who need information for their duties. Staff are expected to respect confidentiality. Relevant information may be shared with professionals involved in your care, subject to applicable confidentiality and data protection requirements.

## 7. Clinical Photography and Video

We may take photographs or videos of your teeth, mouth or face for clinical assessment, treatment planning, monitoring, documentation and record-keeping. Clinical images are confidential and generally form part of the clinical record.

### Marketing and social media

We may invite patients to permit use of photographs, videos or treatment outcomes on our website, social media, printed materials or advertising. We will obtain separate, explicit consent before using identifiable clinical images for marketing. This is voluntary and does not affect your care. You may withdraw consent; we will stop further use and take reasonable steps to remove material from channels we control, but cannot guarantee removal of copies distributed by third parties.

## 8. Specialist Referrals, Laboratories and Treatment Providers

We may share relevant details, radiographs, photographs, digital scans and treatment specifications with referring dentists, specialists, laboratories, Invisalign or other aligner providers, implant and restorative providers, and diagnostic services where necessary for care. We limit sharing to what is necessary. Recipients may act as independent controllers or processors.

## 9. Appointment Communications

We may contact you by telephone, email, SMS or other agreed channels about appointments, reminders, treatment, estimates, payments, aftercare, follow-ups and routine examination or hygiene recalls. These administrative and care messages are distinct from promotional marketing. Please tell us about communication preferences or confidentiality concerns.

## 10. Marketing Communications

We may send practice news, event information, service updates and promotions where legally permitted. Where required, we obtain consent for electronic marketing; where an existing-customer exemption applies, we provide an appropriate opt-out. You can unsubscribe or contact us at any time. Opting out does not stop necessary treatment and administrative communications. We do not sell patient lists or disclose clinical information to advertising platforms for targeting. Digital advertising, including Meta, is subject to applicable privacy and marketing requirements.

## 11. CCTV

CCTV is used to maintain security, protect patients, staff, visitors and property, and prevent or investigate crime. Our lawful basis is legitimate interests. Access is restricted to authorised personnel. Recordings are generally retained for approximately 40 days before automatic overwriting, unless needed for an investigation, legal proceedings or another lawful purpose. Footage may be shared with police, insurers or other appropriate parties where legally justified. Individuals may request access to footage of themselves, subject to applicable exemptions and others' privacy rights. Cameras are used only where necessary and proportionate, with appropriate signage.

## 12. Payment Processing and Patient Finance

We process information for fees, deposits, refunds and accounts. External providers may include Coherent Healthcare, Stripe, Tabeo and banks. If you apply for finance, relevant information may be shared with the provider, which may be an independent controller with its own privacy notice. Complete payment card details are ordinarily processed securely by external providers.

## 13. Third-Party Service Providers

- Dentally for patient records and practice management
- Coherent Healthcare and other payment providers
- Coherent for patient communication
- Tabeo for patient finance
- Dental laboratories, aligner and treatment providers
- IT, hosting, communications, website and marketing providers
- Accountants, advisers and insurers

We assess provider arrangements and use appropriate contractual safeguards where they process data for us. Information may also be disclosed where required by law or justified in legal proceedings.

## 14. International Data Transfers

Some providers may process information outside the UK. Where international transfers occur, we use appropriate safeguards, such as UK adequacy regulations or approved contractual protections, as applicable. Further information may be requested from us.

## 15. How Long We Keep Your Information

We retain information only for as long as necessary, taking account of professional guidance, legal obligations and legitimate business needs. General arrangements include:

- Adult clinical records: retained in accordance with applicable Scottish dental record-keeping guidance and legal requirements.
- Children's clinical records: retained in accordance with applicable extended requirements.
- Clinical photographs, scans and radiographs: generally retained as part of the clinical record.
- Enquiries that do not become patients: normally up to 12 months after last meaningful contact, unless longer retention is justified.
- Marketing information: until consent is withdrawn, an individual opts out or the information is no longer required.
- Marketing suppression records: limited information kept as needed to respect opt-outs.
- CCTV: generally approximately 40 days, unless longer retention is justified.
- Financial and accounting records: normally at least six years, or longer where required.

- Complaints and legal matters: retained according to applicable legal and regulatory requirements.
- Recruitment information: retained in accordance with our recruitment arrangements.

Information may be retained longer for investigations, legal claims or regulatory matters. When no longer required, it is securely deleted, destroyed or anonymised.

### 16. Information Security

We use appropriate technical and organisational measures to protect information against unauthorised access, loss, misuse, alteration or disclosure. These may include access permissions, secure systems, authentication, backups, confidentiality training, provider contracts and incident procedures. No system can guarantee absolute security.

### 17. Website Cookies and Analytics

Our website may use cookies for essential functions, analytics and measuring communications. Where required, we request consent before using non-essential cookies or similar tracking technologies. Preferences can be managed through website cookie controls. Our Cookie Policy should identify relevant cookies, providers, purposes and durations.

### 18. Your Data Protection Rights

- Access to personal information
- Correction of inaccurate or incomplete information
- Erasure where legally permitted
- Restriction of processing in relevant circumstances
- Objection to certain processing and direct marketing
- Data portability where applicable
- Withdrawal of consent where relied upon
- Rights relating to qualifying solely automated decisions

These rights are not absolute; for example, clinical records may need to be retained. We normally respond within one calendar month, subject to lawful extensions and exemptions, and may request identification.

### 19. Children’s Information

We protect children’s information and process it where necessary for care and other lawful purposes. We take account of age, maturity, capacity and confidentiality when handling consent, parental involvement and access requests. Records are retained under applicable professional and legal requirements.

## 20. Complaints and Concerns

Please contact us if you have concerns about how we handle personal information. You may also complain to the Information Commissioner's Office (ICO) at www.ico.org.uk or 0303 123 1113. We welcome the opportunity to resolve concerns directly.

## 21. Changes to This Policy

We may update this policy to reflect changes in our services, technology, legal requirements or practices. The latest version will be published on our website with its update date.

## 22. Contact Us

The Row Dental
31 Albany Street, Edinburgh, Scotland
Email: info@therowdental.com
Telephone: 0131 210 0103
Website: www.therowdental.com