Privacy Notice – IGDPR

Plain English explanation Holly Tree Surgery is committed to protecting your personal information and handling it in a secure, lawful, and transparent way. This notice explains how we collect, use, and store your personal data in line with the UK General Data Protection Regulation (UK GDPR) and the NHS Information Governance framework. Pemberton Surgery is the Data Controller for the information we process.	
1**) Data Controller** contact details	Holly Tree Surgery 42 Boundstone Rd Wrecclesham Farnham GU10 4TG
2) Data Protection Officer contact details	Mr Umar Sabat Umar.sabat@ig-health.co.uk
3) **Purpose** of the processing	We process personal data to provide safe and effective healthcare, manage appointments, communicate with patients about their care, coordinate with other NHS services involved in your treatment, and carry out the administrative and operational tasks necessary to run Pemberton Surgery. This includes ensuring compliance with legal obligations, maintaining patient records, and supporting quality and safety in the delivery of healthcare services.
4) **Lawful basis** for processing	The legal basis is: Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And for Special Category Data Article 9(2)(h) “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;”
5) **Recipient or categories of recipients** of the shared data	Personal data may be shared securely with authorised staff within Pemberton Surgery who need access to deliver care or manage administrative tasks. Where necessary for your treatment, information may also be shared with other NHS healthcare providers, including hospitals, community health services, and the NHS Integrated Care Board (ICB). We may also share information with regulatory or oversight bodies where required by law. Personal data is not shared with commercial organisations for marketing purposes.
6) **Rights to object**	Under the UK General Data Protection Regulation (UK GDPR), you have the right to object to the processing of your personal data where we rely on certain lawful bases, such as processing necessary for administrative purposes or direct communications. If you wish to object, Pemberton Surgery will carefully consider your

	request and will only continue processing your data where we have compelling legitimate reasons or where it is necessary to provide healthcare services. To exercise this right, you can contact the practice directly.
7) **Right to access and correct**	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8**) Retention period**	Personal data, including patient records and administrative information, is retained only for as long as necessary to provide healthcare, manage the surgery, and comply with legal obligations. Clinical records are generally kept for at least 10 years after the last patient contact, or longer for children until their 25th birthday, in line with the NHS Records Management Code of Practice. Staff and administrative records are retained according to NHS and legal requirements. Once the retention period has expired, data is securely deleted or anonymised in accordance with NHS-approved policies.
9) **Right to Complain**.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

Please note the National Data Opt Out does not apply to this sharing of information. For further information please see: https://www.nhs.uk/your-nhs-data-matters/

Date created: 08.04.2026

Last updated: