



Privacy Notice

Last updated: 11 August 2026

1. Purpose of this notice

This notice explains how Estuary Physio Ltd collects, uses, stores and shares personal information. It applies to patients, prospective patients, relatives, carers, representatives, referrers, website visitors and anyone who contacts us.

2. Who we are

Estuary Physio Ltd, trading as Estuary Physio, provides physiotherapy services. We are the data controller, which means we decide why and how personal information is used.

Estuary Physio Ltd | Company number 12454547 | Registered office: 232 Benfleet Road, Benfleet, Essex, SS7 1QQ | Telephone: 020 3773 5799

Email: admin@estuaryphysio.com

3. Information we collect

Depending on your relationship with us and the services provided, we may collect:

- Identity and contact details, including your name, address, date of birth, telephone number and email address.
- Details of relatives, carers, representatives, next of kin, referrers and professionals involved in your care.
- Health and care information, including medical history, diagnoses, medication, disability, mobility, symptoms, safeguarding or capacity information and treatment needs.
- Physiotherapy assessments, clinical notes, treatment and exercise programmes, outcome measures, goals, progress, reports and clinical correspondence.
- Appointment, attendance, cancellation, invoice, payment-status and payer information. We do not normally retain complete payment-card details.
- Emails, calls, website enquiries, complaints, incidents and information connected with legal or insurance matters.

- Website and device information, such as IP address, browser, website activity, security logs and cookie identifiers.

Health information is special-category personal data and receives additional legal protection.

4. Where information comes from

Most information comes directly from you or a person acting on your behalf. We may also receive it from relatives or carers; GPs, consultants, hospitals and other care professionals; care homes or supported-living services; case managers, insurers, solicitors, employers or treatment funders; other rehabilitation providers; and the systems used to deliver our services.

If another person refers you or gives us information about you, we will normally make this notice available by or before our first direct communication with you. Anyone giving us information about another person should be authorised to do so.

5. How and why we use information

Providing physiotherapy

We use information to respond to enquiries and referrals, assess whether our service is suitable, arrange appointments, provide and coordinate care, maintain clinical records, prepare rehabilitation programmes, monitor progress and communicate about treatment.

Our lawful basis is usually that processing is necessary to take steps at your request or perform our contract with you. For health information, we rely principally on the condition that processing is necessary for providing or managing health or social care by professionals who are subject to confidentiality requirements.

Safety, safeguarding and legal responsibilities

We may use or share information to protect you or another person, respond to an emergency, manage a safeguarding concern, comply with the law or establish, exercise or defend legal claims. Depending on the circumstances, we rely on legal obligation, vital interests or legitimate interests. For health information, we may rely on the conditions covering health or social care, vital interests, legal claims or substantial public interest.

Administration and payment

We use information to arrange appointments, invoice, reconcile payments, communicate with funders, recover unpaid fees and keep financial and tax records. We rely on our contract, legal obligations and legitimate interests in administering the service and receiving payment.

Service management and improvement

We use proportionate information to plan capacity, monitor activity and outcomes, understand referrals, improve quality and patient experience, protect our systems and manage complaints, incidents, insurance matters and legal claims. We rely on legitimate interests and, where health information is involved, the conditions covering healthcare management or legal claims. We assess whether this use is necessary and whether your rights override our interests.

Marketing

We may send information about Estuary Physio services where you have consented or electronic-marketing law otherwise permits it. Clinical information is not normally used to target marketing. You may withdraw consent or object at any time. Appointment reminders, treatment communications and essential service messages are not marketing.

6. Is providing information compulsory?

Information needed to assess your needs, provide treatment, keep appropriate clinical records, administer payment or meet legal and professional responsibilities is necessary for us to provide the service. If it is not provided, we may be unable to offer or continue treatment. Optional marketing and other optional activities remain voluntary.

7. Systems and service providers

We use carefully selected providers to deliver and administer our services. The main systems are:

- **Cliniko:** our principal patient-management and clinical-record system, which may hold identity, contact, referral, appointment, clinical, communication, invoice and payment information.
- **Microsoft SharePoint and Microsoft 365:** secure document storage, collaboration and administration, which may include referrals, reports, correspondence and administrative documents.
- **Physitrack and PhysiApp:** digital exercise and rehabilitation programmes, which may process relevant patient contact, condition and programme information.
- **Xero:** accounting and invoicing information. We do not intentionally place treatment notes or detailed clinical information in Xero.
- **Google Workspace:** email, calendars and administration, including correspondence, referrals, reports and attachments sent to or by us.
- **Website, analytics and advertising services:** website enquiries and, subject to cookie choices, services such as Google Analytics and Google Ads used to understand website use and measure enquiries.

- **Payment, banking, professional and IT providers:** payment providers, banks, accountants, insurers, legal advisers and IT support receive only the information reasonably required for their role.

8. ClinicSignal

We use ClinicSignal, provided by HMDG Ltd, to analyse appointment, referral, financial and service-performance information from Cliniko. This helps us manage and improve our services and identify patients who may be appropriate for recall.

ClinicSignal primarily uses pseudonymised information and does not import treatment notes, attachments or free-text clinical information. When an authorised Estuary Physio user accesses certain recall features, limited contact details may be obtained from Cliniko and displayed to that user.

ClinicSignal may use an external artificial-intelligence provider to produce summaries from aggregated or pseudonymised management information. It is not used to diagnose patients, recommend treatment or make significant automated decisions. Any decision to contact or treat a patient remains with Estuary Physio.

9. Who we share information with

Where reasonably necessary, we may share relevant information with:

- Estuary Physio clinicians, administrative staff and authorised contractors.
- GPs, consultants and other health or social-care professionals involved in your care.
- Relatives, carers, representatives, care homes or supported-living services where appropriate and authorised.
- Case managers, insurers, solicitors, employers or organisations arranging or funding treatment.
- The service providers named above and other providers supporting our services.
- Accountants, advisers, insurers, regulators, safeguarding authorities, HM Revenue and Customs, law-enforcement bodies or courts where required or permitted by law.

We share only what is reasonably necessary and do not sell patient information. Significant disclosures connected with care will usually be discussed with you, but consent is not always required where sharing is necessary for safe care, a legal duty, protection from harm or a legal claim.

10. International processing

Some providers or their subcontractors may process information outside the United Kingdom. Where this happens, we require a legally recognised safeguard, such as UK

adequacy regulations, the UK International Data Transfer Agreement or the UK Addendum to approved contractual clauses. You may contact us for more information about a particular provider's safeguards.

11. How long we keep information

We keep information only as long as reasonably necessary, taking account of professional guidance, legal duties, insurance requirements and relevant limitation periods. Our usual periods are:

- **Adult clinical records:** normally eight years after the last treatment.
- **Children's clinical records:** normally until at least the 25th birthday, or the 26th birthday if treatment ended at age 17, subject to applicable professional guidance.
- **Safeguarding, capacity, complaint, serious-incident or potential-claim records:** longer where necessary.
- **Financial, tax and accounting records:** normally six years after the relevant financial or accounting period.
- **Enquiries that do not proceed:** normally up to two years after the last contact, unless longer retention is justified.
- **Marketing information:** until you withdraw consent or object; a minimal suppression record may be kept so your preference continues to be respected.
- **Website and cookie information:** for the periods stated in our cookie information or provider settings.
- **Downloaded ClinicSignal Recall files:** only as long as needed for the specific activity, unless information must form part of another legitimate record.

Backups may retain information for a limited additional period before secure overwrite or deletion. We review retention when circumstances or professional guidance require it.

12. Keeping information secure

We use appropriate technical and organisational measures, including role-based access, password and multi-factor authentication controls, encryption and secure transmission where appropriate, secure cloud systems and backups, confidentiality requirements, provider agreements and breach-response procedures. Access is limited to people who need the information for authorised work.

If a personal-data breach occurs, we investigate it and notify affected people and the Information Commissioner's Office where the law requires this.

13. Your rights

Depending on the circumstances, you may ask us to confirm whether we use your information; provide access and a copy; correct inaccurate or incomplete information;

erase information where the right applies; restrict processing; provide portable data where the legal conditions apply; or provide human review of a solely automated decision with legal or similarly significant effects. You may also withdraw consent where processing relies on consent.

These rights are not absolute. For example, we may need to retain a clinical record for patient safety, professional, legal, regulatory, insurance or legal-claims reasons.

14. Your right to object

You may object at any time to direct marketing. You may also object to processing based on legitimate interests. We will consider the circumstances and stop unless we have compelling legitimate grounds or the processing is needed for legal claims.

To exercise a right, email admin@estuaryphysio.com. We may ask for information to confirm your identity. We normally respond within one month, although the law permits more time in certain complex cases. Requests are normally free, but we may charge a reasonable fee or refuse a request where the law allows, including where it is manifestly unfounded or excessive.

15. Data-protection complaints

If you are concerned about our use of personal information, email admin@estuaryphysio.com with the subject 'Data protection complaint', or write to Estuary Physio Ltd at 232 Benfleet Road, Benfleet, Essex, SS7 1QQ.

We will acknowledge a data-protection complaint within 30 days, take appropriate steps to investigate it without undue delay, keep you informed where appropriate and tell you the outcome without undue delay.

You may also complain to the Information Commissioner's Office: [ICO website](https://ico.org.uk/) | Telephone: 0303 123 1113 | Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

16. Changes to this notice

We may update this notice when our services, systems or legal responsibilities change. The current version will be published on our website. If a change is material or introduces a significant new use of information, we will take reasonable steps to bring it to the attention of affected people before the new processing begins.

17. Contact us

For questions about this notice, requests concerning your information or data-protection complaints, contact Estuary Physio Ltd:

Email: admin@estuaryphysio.com

Telephone: 020 3773 5799 | Address: 232 Benfleet Road, Benfleet, Essex, SS7 1QQ