



Website privacy notice

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Portman Healthcare (Group) Limited, its subsidiaries and group companies and Portman Healthcare Holdings (Ireland) Limited, (collectively “we”, “our”, “us”, “the Companies”, (“PortmanDentex and PortmanDentex (Ireland)”) are committed to safeguarding your privacy. This website privacy notice explains how we collect, use and protect your personal data when you use our website.

Purpose

PortmanDentex and PortmanDentex (Ireland) are a “controller” in relation to personal data. We are responsible for deciding how we hold and use personal information about you. This privacy notice provides you with certain information that must be provided in accordance with the UK General Data Protection Regulation (UK GDPR), the Data (Use and Access) Act 2025, the EU General Data Protection Regulation ((EU) 2016/679) (EU GDPR), and the Data Protection Act 2018 (together, the “Data Protection Legislation”).

Contact details

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice and our data handling. If you have any questions about this privacy notice or about the use of your personal data or you want to exercise your privacy rights, please contact our DPO in the following ways:

Email address:	privacy@portmandental.co.uk
Postal office address:	Data Protection Officer, Portman Healthcare (Group) Limited, Rosehill, New Barn Lane, Cheltenham GL52 3LZ

Supervisory Authorities’ details are provided in the Complaints section below. We ask that you contact us first so we can seek to resolve your concerns promptly.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.



The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer the following different kinds of personal data about you:

- **Identity and contact data** – when you register as a patient, enquire about treatments or otherwise interact with our website, we may request your name, postal address, email address and telephone number. This allows us to book you in for an appointment, set up a patient profile for you and / or deal with your enquiry.
- **Usage, marketing and communications data** – this includes information about how you use our website, products and services. We may also collect data about your preferences in receiving marketing / communications from us. You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you subscribe for news and updates, in each case, if you have opted in to receiving that marketing. For further information, please see the Marketing & communications section below.
- **Technical data** – this includes internet protocol (IP) address. IP addresses are used by your computer every time you are connected to the Internet. Your IP address is a number that is used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data known as “traffic data” so that data (such as the Web pages you request) can be sent to you, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. As you interact with our website, we may collect this data by using cookies and other similar technologies. Please see our Cookies Policy for further information. We may receive technical data about you from third parties, including analytics providers such as Google.
- **Special Category Data** – When you register as a new patient or enquire about new treatments, we may collect certain information about your dental health. We will only collect this information directly from you.

Legal basis: We process such data where necessary for health or social care purposes and the management of healthcare systems and services provided to you, and for the establishment, exercise or defence of legal claims. Where required, we will obtain your explicit consent. We apply additional safeguards, including strict access controls, confidentiality obligations and secure systems. We do not process other special category data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your genetic and biometric data via the website) and do not collect criminal offence data.



Some companies provide services to you on our behalf, such as the agencies who manage our website or the live chat function. We may share your personal data with these companies so that they can process it and we can provide services to you. These companies can only use your data on our instructions (i.e., not for their own purposes) and they must act in accordance with data protection laws.

Payment Details – If you make a payment on the website, your credit and debit card details are processed by a third-party payment provider. We do not store any of your credit and debit card information.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email, text message or postage – please see How and why we use your data below.

A special note about children

Children are not eligible to use our website and services and we ask that minors (under the age of 18) do not submit any personal information to us. If you are a minor, you can use this site only in conjunction with permission and guidance from your parents or guardians.

How we collect your data

We collect data:

- Directly from you (e.g. when you fill in a contact form or sign up for newsletters, or connect via a live chat)
- Automatically through cookies, server logs and similar technologies. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- From third-party tools like analytics and advertising platforms
 - Technical Data is collected from the following parties:
 - analytics providers such as Google based outside the UK;
 - advertising networks such as Meta Ads, Google Ads based outside the UK; and
 - search information providers such as AccuRanker, Sitebulb, Elfsight, Truconversion and Local Viking based outside the UK.
 - Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services such as Stripe and Barclaycard based inside the UK.



How and why we use your data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following ways, based on the lawful bases indicated:

- To respond to enquiries or contact forms – Lawful Basis - our legitimate interests in operating our business and providing information and support to prospective and existing patients.
- To send you newsletters or promotional emails – Lawful Basis - consent
- To provide website analytics and improve site functionality – Lawful Basis - consent (via cookies)
- To ensure website security and prevent fraud – Lawful Basis – our legitimate interests in securing our systems and preventing misuse.
- To comply with legal obligations e.g. ICO/DPC/HMRC requests – Lawful Basis – compliance with the law
- To perform a contract with you and deliver services to you – Lawful Basis – performance of a contract

Legitimate Interest Assessment (summary)

Where we rely on legitimate interests, we have balanced our interests in communicating with you, operating and securing our website and business, and improving our services, against your interests and fundamental rights. We minimise data collected, limit retention, provide easy opt-outs for marketing, and implement appropriate safeguards. You can object to processing based on legitimate interests at any time (see Your Rights).

Consent and withdrawal

For activities that rely on consent, we will ask you to provide a clear affirmative choice. You may withdraw consent at any time by contacting privacy@portmandental.co.uk or using the unsubscribe or preferences links provided in our communications. Withdrawal will not affect the lawfulness of processing before withdrawal, and may affect our ability to provide some services.

We will include the option to withdraw consent in every marketing communication that you receive from us.



Marketing and communications

If you raise an enquiry with us or book an appointment via our website, we will ask for your consent to store and use your personal data for marketing purposes. For example, to share certain offers or promotions that may be of interest to you or provide you with news and information about a practice.

If you choose not to provide your consent for us to use your data in this way, we will not send you any marketing communications and your data will be solely used for the purposes of providing our services to you, as further detailed in this privacy notice. If you do wish to receive marketing information from us, we may share this data with our parent company, either Portman Healthcare (Group) Limited or Portman Healthcare Ireland (Holdings) Limited and certain third-party companies for remarketing purposes.

You may see certain advertisements for our website, or products, on third party websites, including on social media or search engines. These advertisements may be tailored to you using cookies (which track your website activity and enable us to serve advertisements to individuals who visit our website). Further information on this can be found in our Cookie Policy. If you see an advertisement on social media relating to one of our practices or products this may be because we have engaged the social network / search engine to show these advertisements. In some cases, this may involve sharing your email address with the social network / search engine.

Your data may also be used to generate anonymised statistics for the purpose of enhancing our website and advertising.

We may use third-party advertising companies to serve ads on our behalf across the Internet. These companies may collect and use information about your visits to this and other websites and your interaction with our products and services in order to provide advertisements about goods and services of interest to you. However, no personally identifiable information (such as your name, address, email address or telephone number) will be connected with such information. They may use information about your visits to this and other websites to target advertisements for goods and services and may be used to keep track of user response to each advertisement. These targeted advertisements may appear on our Websites or on other sites that you visit. The anonymous information is collected through the use of a pixel tag or cookies, which are industry standard technologies used by most major websites. If you do not want such companies to collect this information you may opt-out.

To learn more about the use of this information or choose not to have this information used by certain third-party advertising partners, please visit the Network Advertising Initiative at networkadvertising.org/choices. Please note that if you delete your cookies, use a different browser, or buy a new computer, you will need to renew your opt-out choice.

The Websites may contain electronic images (called a “single-pixel GIF” or a “web beacon”) that allow a website to track the effectiveness of marketing campaigns. No personally identifiable information will be transmitted via web beacons.



Cookies

For more information about the cookies we use and how to change your cookie preferences, please see our Cookie Policy.

Sharing your personal data

We may share your data with:

- Website hosting and IT support providers
- Analytics and advertising platforms (e.g. Google Analytics, Facebook Pixel)
- Email marketing service providers (e.g. Mailchimp)
- Regulators, law enforcement, or other legal authorities when required

All third parties are contractually obliged to protect your information and may not use it for their own purposes.

Our current list of third party recipients here: - Google (Analytics & Ads), Meta (Facebook and Instagram), Microsoft (Bing Ads), Boxly, Dengro, Insvestiage, Roboreception, Chiron, Dentally, Orthotrac, R4, Systems For Dentists (SfD), Software of Excellence (SOE), Stripe, Barclaycard

Our use of call tracking

We may have call tracking installed on our website. This tracking will automatically record certain information about the visitor by using various types of technology including cookies, clear gifs or web beacons. This automatically collected information may include the phone number, IP address or other device address or ID, geographic location of the Visitor, web browser and/or device type, the web pages or sites visited just before or just after visiting the site, the pages or other content the visitor views or interacts with, and the dates and times of the visit. Calls may also be recorded.

Recordings are retained and accessed only for quality, training, fraud prevention and dispute resolution, subject to retention periods below.

Transferring information outside the UK

We may transfer personal information we collect about you to countries outside the UK in order to perform our contract with you. Where it is necessary to do so, we will ensure that appropriate safeguards are in place to ensure the protection of your personal data including UK and EU adequacy regulations, International Data Transfer Agreements and Standard Contractual Clauses with supplementary measures as needed. You can obtain a copy of the relevant safeguards by contacting the DPO.



Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those colleagues, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you, and any applicable regulator, of a breach where we are legally required to do so.

Data retention

We only retain your data for as long as necessary to fulfil the purposes we collected it for, including any legal, regulatory or operational requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

These are the retention criteria applied in our existing policy framework.

Specific periods:

- Enquiry data: 12 months from last interaction
- Marketing data: until you withdraw consent or 24 months of inactivity, whichever is sooner
- Website analytics data: 14 months (or provider default where shorter)
- Call recordings: 6 months unless needed for dispute resolution or legal claims



Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are as follows: You have the right to:

- Request access your personal data (commonly known as a “subject access request or data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- To be informed of the collection and use of your personal data.
- Request correction of your personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. We may refuse erasure where processing is necessary for exercising freedom of expression and information, compliance with a legal obligation, public interest in public health, archiving/ research/statistics where deletion is likely to seriously impair objectives, or for the establishment, exercise or defence of legal claims.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data’s accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object;
- Object any time to the processing of your personal data for direct marketing purposes (see the above paragraph “Marketing and Communications”);



- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- Right to withdraw consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at

privacy@portmandental.co.uk

Complaints: If we refuse, or if you are dissatisfied with our response, you may complain using the procedure below and to the relevant supervisory authority.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

Complaints: If we refuse, or if you are dissatisfied with our response, you may complain using the procedure below and to the relevant supervisory authority.

Profiling and automated decision making

We do not make decisions producing legal or similarly significant effects based solely on automated processing. We may use profiling for marketing segmentation and to tailor advertising using cookies and similar technologies, subject to your consent and preferences. You can object to profiling for marketing and change your cookie settings at any time.



Republic of Ireland Correspondence and Supervisory Authorities

Where your data is processed by Portman Healthcare Holdings (Ireland) Limited, the competent supervisory authority is the Data Protection Commission. For UK processing, the competent authority is the Information Commissioner’s Office.

Forwarding and handling ROI correspondence: If you contact the DPO using the details above, we will ensure your correspondence is routed to the appropriate controller and supervisory authority contact depending on the data subject’s location and the processing in question. For data subjects in the Republic of Ireland, we will liaise with Portman Healthcare Holdings (Ireland) Limited and coordinate responses, including forwarding any DPC correspondence to the relevant Irish team and legal contact. For UK data subjects, we will coordinate with Portman Healthcare (Group) Limited.

Supervisory authority contact details are as follows:

Telephone number:	01 7650100 / 1800 437 737
Website:	www.dataprotection.ie
Address:	Data Protection Commission, 6 Pembroke Row, Dublin 2 D02 X963, Ireland



Complaints

Please contact us in the first instance as we would appreciate the chance to deal with your concerns before you approach a Supervisory Authority.

The ICO will expect you to have done this before reviewing your complaint. You can find all our complaints information [here](#).

The Information Commissioner's Office

Telephone number:	0303 123 1113
Website:	www.ico.org.uk
Address:	Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

The Data Protection Commission – Republic of Ireland

Telephone number:	01 7650100 / 1800437 737
Website:	dataprotection.ie/en
Address:	Contact form 6 Pembroke Row, Dublin 2 D02 X963, Ireland

Changes to this privacy notice

This privacy notice was last updated on 18 May 2026

We may change this privacy notice from time to time by publishing a new version on our website.

