



Privacy Policy & GDPR

Smile Compare

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How we handle your personal and dental health information.

This Privacy Policy and Data Protection Statement explains how Smile Compare collects, uses, shares and protects personal data when you visit our website, submit an enquiry, or use our patient introduction service. It is written to meet our obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (as amended by the Data (Use and Access) Act 2025), and the Privacy and Electronic Communications Regulations (PECR).

1. Who we are

Smile Compare Ltd is the independent data controller for the personal data described in this policy. That means we decide how and why your personal data is processed, and we take full responsibility for that. We are not a data processor; we do not act on the instructions of clinics when we collect and hold your data. When data is shared with a clinic with your explicit consent, the clinic becomes a separate independent data controller for the data in its own clinical records.

Our registered details and Information Commissioner's Office (ICO) data protection registration reference are published on the website.

Data protection contact. For any question, request or complaint about how we handle your personal data, email info@smilecompare.co.uk.

2. The personal data we collect

2.1 Information you give us directly

- Identification and contact information: name, email address, telephone number, country of residence.
- Enquiry information: treatment you are interested in, preferred dates, budget, and any accessibility needs.
- Health and dental information: medical history, current medications, allergies, dental history, and photographs or x-rays you choose to share. This is special category data under UK GDPR.
- Communications with us: emails, WhatsApp messages and completed forms.
- Payment-related information only where you purchase an optional add-on service from us directly. We do not collect treatment payments; those are paid directly to the Clinic.

2.2 Information we collect about your device and visit

Smile Compare has made a deliberate decision not to run analytics, advertising or tracking cookies on the website. We do not build user profiles, we do not run behavioural advertising, and we do not pass visitor data to analytics providers. The only cookies we use are strictly necessary cookies required to deliver the website securely, as described in our Cookie Policy.

2.3 Information we receive from third parties

- Information a clinic shares back with us in connection with your enquiry, for example the indicative treatment plan and quotation.
- Information from regulated third-party service providers we sign-post, for example travel or insurance providers, limited to what we need to manage your journey.
- Publicly available information, for example a clinic's published reviews, regulatory status or credentials, which we use for clinic vetting rather than to profile patients.

3. Why we use your personal data, and our lawful basis

Under UK GDPR we can only use your personal data when we have a valid lawful basis. The following table sets out, for each purpose, the lawful basis we rely on.

Purpose	Lawful basis
Responding to website enquiries and providing general information about our service	Legitimate interests (Article 6(1)(f)) — operating a responsive introduction service, balanced against the minimal data used
Sharing your enquiry information, including health data, with one or more clinics so they can provide an indicative treatment plan	Non-health data: contract (Art. 6(1)(b)) or consent (Art. 6(1)(a)) pre-contract. Health data: explicit consent (Art. 9(2)(a)) via our Patient Data Sharing Consent process.
Providing patient support before, during and after treatment, including journey coordination and complaint handling	Contract (Art. 6(1)(b)) and legitimate interests (Art. 6(1)(f))
Administering optional add-on services you purchase from us (for example travel protection or independent x-ray referrals)	Contract (Art. 6(1)(b))
Meeting our legal and regulatory obligations (for example tax, accounting and responding to lawful requests)	Legal obligation (Art. 6(1)(c))
Investigating complaints, defending legal claims, and preventing fraud or misuse of our service	Legitimate interests (Art. 6(1)(f)); for special category data, establishment/exercise/defence of legal claims (Art. 9(2)(f))
Sending you service updates about an ongoing enquiry or treatment journey	Contract (Art. 6(1)(b))
Sending marketing communications (only where you have opted in)	Consent (Art. 6(1)(a) and PECR). You can withdraw consent at any time.

Recognised legitimate interests under the Data (Use and Access) Act 2025. The DUAA introduces a list of “recognised legitimate interests” that allow certain processing without a full Legitimate Interests Assessment. Smile Compare does not rely on this new basis for any processing of patient enquiry or health data. We continue to rely on the bases set out in the table above, with explicit consent under Article 9(2)(a) for the sharing of health data with clinics.

4. Special category health data

Dental health information, x-rays, clinical photographs and medical history are special category data. We apply additional safeguards:

- We only collect what is needed to obtain an accurate indicative treatment plan from a clinic.
- We rely on your **explicit, informed consent** to share health data with a named clinic, captured via our Patient Data Sharing Consent process.
- Staff access to health data inside Smile Compare is limited to those who need it to operate the introduction service.

Withdrawal of consent — what you need to know. You can withdraw consent at any time. When you do, processing by Smile Compare ceases immediately and no further data is shared with any clinic. However, data that has already been shared with an overseas clinic before the point of withdrawal cannot be recalled by Smile Compare — that clinic is an independent controller and may hold the data under its own lawful basis (including its own legal obligations to retain clinical records once treatment has started). We communicate this at the point of consent so that you have an accurate expectation.

5. Who we share your personal data with

We share your personal data only where necessary, and only with the categories of recipient listed below.

5.1 Clinics

With your explicit consent, we share your enquiry and health information with the clinic or clinics you select. Once shared, the clinic becomes an independent data controller for the personal data in its own clinical records. The clinic's own privacy notice applies to its processing.

5.2 Service providers

- Website hosting and email providers.
- Secure messaging channels (for example WhatsApp, for the purpose of our sales and patient support inboxes).
- Document signing and storage tools used to manage consents, patient packs and clinic agreements.
- Regulated travel or insurance providers for optional add-on products.

These providers act as data processors on our behalf, under written contracts that set out security and confidentiality obligations in line with UK GDPR.

5.3 Professional advisors and regulators

We may share personal data with our professional advisors (legal, accounting, insurance and audit) and with regulators or law enforcement, where we are legally required or where necessary to establish, exercise or defend legal claims.

5.4 In connection with a business sale or restructure

If Smile Compare is involved in a merger, acquisition, asset sale or restructuring, we may share personal data with prospective buyers and their advisors under appropriate confidentiality arrangements.

We do not sell your data. We do not share your data with advertisers. We do not use your data for marketing unrelated to your enquiry.

6. Sending your personal data outside the UK

Because the dental clinic providers we introduce patients to are based overseas — most notably in Turkey — providing our introduction service requires us to transfer your personal data to countries outside the United Kingdom. The United Kingdom does not, at the time of this policy, benefit from a full adequacy decision in respect of all countries we work with.

Where we transfer your personal data outside the UK, we rely on one or more of the following safeguards:

- **Your explicit, informed consent** to the specific transfer, including being informed of the possible risks of the transfer in the absence of adequacy (derogation under Article 49(1)(a) UK GDPR). This is our primary mechanism for sharing health data with overseas clinics, captured in the Patient Data Sharing Consent.
- **The UK International Data Transfer Agreement**, or the UK Addendum to the EU Standard Contractual Clauses, with an associated Transfer Risk Assessment, where the recipient is a data processor acting on our behalf.
- **Transfers necessary for the performance or conclusion of a contract** between you and a third party in your interest (Article 49(1)(c) UK GDPR), where applicable.

Where the overseas clinic is in a jurisdiction with its own data protection regime — for example, Turkey, which operates under KVKK (the Turkish Personal Data Protection Law) — the clinic

confirms compliance with that regime at onboarding. This sits alongside, and does not replace, the explicit consent basis relied on for the transfer itself.

What this means for you. Before we share any of your enquiry or health information with an overseas clinic, we will clearly tell you which clinic will receive the data, what the clinic will use it for, what data will be shared, and the implications of the transfer. You decide whether to give your explicit consent. You can refuse without losing access to our website or to a different clinic introduction.

7. How long we keep your personal data

We only keep personal data for as long as we need it for the purpose for which it was collected, or for as long as the law requires. The following retention periods are our standard approach and may be shortened on request where lawful.

Category of data	Retention period
General website enquiries that do not progress to an Introduction	Up to 12 months from last contact, after which the record is deleted or anonymised
Enquiries that progress to an Introduction, including patient pack and consent records	7 years from the end of the treatment journey, to meet record-keeping, complaint handling and potential legal claim requirements
Health data and x-rays held by Smile Compare in connection with an Introduction	Deleted from our systems at the earlier of (i) completion of the treatment journey plus 12 months, or (ii) on justified request, except where we must retain to meet a legal obligation or defend a legal claim
Patient complaint records	7 years from closure of the complaint
Accounting and tax records	Minimum 6 years plus the current year, in line with HMRC requirements
Marketing contacts	Until you opt out, or 24 months of inactivity, whichever is earlier

Clinics hold their own clinical records under their own retention schedules and under the law of the country in which they operate. You should contact the clinic directly to understand its clinical records retention.

8. How we protect your personal data

We apply organisational and technical measures that are proportionate to the sensitivity of the data we handle. These include:

- Role-based access to enquiry and health data, with access restricted to staff who need it for the introduction service.
- Encryption of personal data in transit and at rest where technically feasible.
- Written data processing terms with our service providers, including security commitments.
- Staff data protection training, including handling of special category data and overseas transfers.
- Regular review of our internal Data Protection Policy and breach response process.

No system is perfectly secure. If we become aware of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO without undue delay and, where required, will notify you too.

9. Your rights under UK data protection law

You have a range of statutory rights in relation to your personal data. You can exercise any of these rights free of charge by emailing info@smilecompare.co.uk.

- **The right to be informed** about how we use your personal data (met by this policy).

- **The right of access** to ask us for a copy of the personal data we hold about you.
- **The right to rectification** of inaccurate or incomplete personal data.
- **The right to erasure** (the right to be forgotten), in certain circumstances.
- **The right to restriction** of processing, in certain circumstances.
- **The right to data portability** — ask us to provide certain personal data in a structured, machine-readable format.
- **The right to object** to processing based on our legitimate interests, and to direct marketing at any time.
- **The right not to be subject to solely automated decisions**, including profiling, with legal or similarly significant effects. Smile Compare does not make such decisions about patients. The Data (Use and Access) Act 2025 has updated the safeguards that apply where automated decision-making is used; if our service ever changes to involve such decisions, we will update this policy and your rights in advance.
- **The right to withdraw consent** where we rely on consent, including consent to share your data with an overseas clinic. Withdrawal is free and does not affect processing that has already occurred. See Section 4 for what happens to data already shared.

We will respond to requests within one calendar month, as required by UK GDPR. We may extend this by up to two further months for complex requests, in which case we will let you know within the first month. In line with the Data (Use and Access) Act 2025, our searches in response to a Data Subject Access Request will be reasonable and proportionate; we will discuss the scope of a request with you where this helps us return the information you actually need.

Complaining to the ICO. You have the right to complain to the Information Commissioner's Office if you believe we have not handled your personal data in line with the law. The ICO's website is ico.org.uk and its helpline is 0303 123 1113. We would, however, appreciate the chance to resolve the issue first — please contact us before escalating.

10. Cookies and similar technologies

Our Cookie Policy describes the limited set of strictly necessary cookies we use. We do not use analytics, advertising, social sharing or other tracking technologies on the Smile Compare website. The Data (Use and Access) Act 2025 permits certain low-risk cookies (for example, those used purely for statistical or service-improvement purposes) to be set without explicit consent, provided users are clearly informed and given an easy way to opt out. We have chosen to take a stricter position and not use these cookies at all at this stage. If we adopt any non-essential cookies in future we will update the Cookie Policy and provide a clear consent or opt-out mechanism before they are set.

11. Children

Our service is directed at adults aged 18 or over. We do not knowingly collect personal data from children. Where a parent, guardian or carer enquires on behalf of a person under 18, we will handle the data under the lawful basis and consent of the authorised adult, and the child's clinical care will be managed by the clinic under its own consent and safeguarding framework.

12. Changes to this policy

We may update this policy from time to time, for example to reflect changes in law or in how our service operates. The current version, with the effective date, will always be available on the website. Where changes are material we will take reasonable steps to bring them to your attention.

Contact

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Smile Compare Ltd. Registered in England and Wales. Company number 17234110. Registered office: 3 Clyde Road, Croydon, CR0 6SY. ICO registration reference: ZC154428.

Smile Compare Ltd holds professional liability insurance appropriate to its activities as an introducer. Details of current cover are available on request.