



D-Restricted Ltd.®

Privacy and Cookies Notice

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Version	Date	Rationale
1.0	05/2018	To become in-line with GDPR legislation 2018
1.1	01/2021	No change to policy
1.2	01/2023	No change to policy
1.3	01/2024	Insertion of terminology table
1.4	01/2025	Acknowledgement of medical record storage software
2.0	01/2026	Full revision and clarification of document inclusive of full reference list.



Terminology:

Mother or Woman: refers to the birthing parent.

Infant Feeding: refers to all methods of feeding inclusive of breastfeeding, chest feeding, wet or dry nursing, human milk feeding, formula feeding or the introduction of solid foods.

Child: anyone who has not reached 18 years of age and for this documents purpose includes young people.

Independent tongue-tie practitioners: are registered health professionals registered nurse (RN), midwife (MW), doctor, dentist, surgeon, osteopath, health visitor (HV), advanced neonatal nurse practitioners (ANNP), who have undertaken training to enable them to perform frenulotomy (tongue-tie division), hold a current professional registration within their field of practice and who work privately. They may also hold other relevant qualifications such as International Board Certified Lactation Consultant (IBCLC).

Parent: also includes legal guardian / caregiver. Documentation should be available to demonstrate legal guardian / caregiver status and the parent's permission to make medical decisions on their baby's behalf.

Registered health professional: a health professional registered with a regulatory body and governed by a code of practice.



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1. Introduction

D-Restricted Ltd provides clinical tongue-tie (frenulotomy) services for infants and is operated by Diana Warren, the sole director and employee. In the course of delivering care, D-Restricted Ltd processes personal and sensitive information relating to service-users and their infants.

D-Restricted Ltd is committed to protecting privacy and handling personal data lawfully, securely, and confidentially, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy explains how personal data is managed to support safe clinical practice and maintain transparency and trust with service-users.

2. Purpose

This policy sets out how D-Restricted Ltd collects, uses, stores, shares, and protects personal data, including information gathered through clinical records, communications, and website cookies. Personal data is processed only where necessary for the delivery of clinical services, continuity of care, safeguarding, and compliance with legal and professional obligations.

The policy also explains the rights of service-users under UK data protection law, including how they may access their information, raise concerns, or withdraw consent to non-essential communications.

3. Scope

This policy applies to all personal and sensitive information collected by D-Restricted Ltd, whether through consultations, online forms, emails, telephone communications, or social media platforms associated with the service. It encompasses clinical records, consent forms, correspondence, photographs or videos taken during assessments or procedures, CCTV recordings, and any data submitted online for booking, feedback, or communication purposes. The policy also governs the use of cookies on D-Restricted Ltd's website www.tongue-tie.info.



4. GDPR and Data Protection

D-Restricted Ltd collects, stores, and processes personal and sensitive information in strict compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Diana Warren, as the sole director and practitioner, is the Data Controller and is responsible for ensuring that all personal data is handled lawfully, fairly, and transparently.

The personal information collected is limited to what is necessary for the provision of safe and effective clinical care for service-users dyads and for their continuity of care. This includes clinical records, consent forms, correspondence, and relevant media such as photographs or videos taken with consent. The information is processed on the legal basis of consent provided by service-users, with a legitimate interest in delivering care, and compliance with statutory and regulatory obligations.

Data subjects have the right to access the information held about them, to request corrections to any inaccuracies, to restrict processing in certain circumstances, and to request secure erasure of data where applicable. Service-users may withdraw consent for non-essential processing, such as receiving follow-up communications, at any time without affecting the care provided. The current software utilised allows service-users to access their own 'patient profiles' to review all records held against them, inclusive of clinical notes, consent, clinical photography and Patient Identifiable Data (PID).

All personal data is stored securely, both electronically and physically. Electronic records are encrypted, password-protected, and backed up to ensure integrity and availability. Paper records are kept in locked cabinets in secure premises. Access to all information is restricted solely to Diana Warren, and data will not be shared with third parties except in accordance with safeguarding requirements, continuity of care obligations, or other legal requirements.

In the event of a data breach, D-Restricted Ltd will take immediate steps to assess and mitigate the impact and, where required, will notify the Information Commissioner's Office in line with statutory obligations. All



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processes are designed to ensure that data privacy and security are maintained at all times.

5. Collection and Use of Personal Data

D-Restricted Ltd collects only the information necessary to deliver safe and effective care to the service-users dyad. This includes a medical history, feeding observations, treatment records, and any correspondence relevant to care. All records are maintained accurately, contemporaneously, and securely. Minimal identifiable information is shared with a child's General Practitioner to communicate treatment provided, using postal methods. In circumstances where there is a safeguarding concern or the service-user, infant or adult is deemed at risk, information may be disclosed to appropriate authorities such as health visitors, social services, or law enforcement, in compliance with legal obligations.

6. Online Submissions and Third-Party Services

Information submitted via the D-Restricted Ltd websites or online forms is transferred securely to the sole data controller, Diana Warren. Wix.com acts as a data processor and is certified under the EU-US and Swiss-US Privacy Shield frameworks, adhering to GDPR principles. Payment processing is conducted through Stripe, which is PCI DSS compliant, ensuring that payment details are securely handled and not stored by D-Restricted Ltd.

7. Confidentiality, Storage, and Security

All personal data, whether electronic or paper-based, is stored securely to prevent unauthorised access. Active records are held on encrypted devices with password and biometric protection. Backups are maintained through automated software and inactive records are transferred to encrypted external storage, and secured in a locked cabinet on the premises. Paper records are kept in locked cabinets within secure premises monitored by intruder alarms and CCTV. Photographs and videos taken for clinical purposes are only used with



explicit parental consent and stored securely. They may be used anonymously for training, audit, or educational purposes, with the service-users' informed consent.

8. Data Retention

D-Restricted Ltd retains all records for 25 years post last contact, in line with NMC guidance and CQC expectations. Records are securely destroyed once the retention period has expired, either by shredding, electronic deletion, or secure disposal of storage devices, ensuring personal information is irretrievable.

9. Access to Personal Data

Service-users have the right to access personal information held about them or their child. Requests must be made in writing, with appropriate identification provided, and will be fulfilled within statutory timeframes. D-Restricted Ltd ensures that information is only shared with verified individuals and in formats that maintain confidentiality and security. In the event the business ceases operations, the ICO will provide guidance on accessing records via the appointed data controller.

10. Cookies and Website Use

D-Restricted Ltd websites use cookies to enhance user experience, store preferences, and collect anonymised analytics data. Cookies do not contain personal information and can be disabled through service-users browser settings. Service-users are advised to review the privacy policies of any external websites accessed through links provided by D-Restricted Ltd.

11. Complaints and ICO Contact

Concerns regarding the handling of personal data should be raised with D-Restricted Ltd in writing. If unsatisfied, service-users may contact the Information Commissioner's Office, the regulator of GDPR in the UK. The ICO can provide guidance, investigate complaints, and enforce compliance with data protection laws.

12. Changes to the Policy

This privacy and cookies policy may be updated periodically to reflect



changes in legislation, technology, or business practices. The most current version will be published on the company websites and communicated to service-users as appropriate.



13. References

Care Quality Commission (CQC) (2015) The fundamental standards. Available at: <https://www.cqc.org.uk/guidance-providers/regulations-enforcement/fundamental-standards> (Accessed: 12 January 2026)

Care Quality Commission (CQC) (2023) Guidance for providers on record keeping. Available at: <https://www.cqc.org.uk/guidance-providers> (Accessed: 12 January 2026)

Data Protection Act 2018. Available at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted> (Accessed: 12 January 2026)

Department of Health and Social Care (DHSC) (2021) Data security and protection toolkit. Available at: <https://www.dsptoolkit.nhs.uk> (Accessed: 12 January 2026)

Information Commissioner's Office (ICO) (n.d.) Guide to data protection. Available at: <https://ico.org.uk/for-organisations/guide-to-data-protection/> (Accessed: 12 January 2026)

Information Commissioner's Office (ICO) (n.d.) Records management and retention. Available at: <https://ico.org.uk/for-organisations/guide-to-data-protection/principle-storage-limitation/> (Accessed: 12 January 2026)

NHS Digital (2021) Data security standards. Available at: <https://digital.nhs.uk/cyber-and-data-security> (Accessed: 12 January 2026)

NHS England (2021) Records management code of practice. Available at: <https://www.england.nhs.uk/publication/records-management-code-of-practice/> (Accessed: 12 January 2026)

Nursing and Midwifery Council (NMC) (2018) The Code: Professional standards of practice and behaviour for nurses, midwives and nursing associates. Available at: <https://www.nmc.org.uk/standards/code/> (Accessed: 12 January 2026)



UK General Data Protection Regulation (UK GDPR). Available at:
<https://www.legislation.gov.uk/eur/2016/679/contents> (Accessed: 12
January 2026)

Wix.com (2021) Privacy Policy. Available at:
<https://www.wix.com/about/privacy> (Accessed: 12 January 2026)

Stripe (2021) Security and compliance. Available at:
<https://stripe.com/docs/security> (Accessed: 12 January 2026)



14. Appendices

Appendix A: Privacy and Cookies Notice Summary Table

Topic	Key Points
Who We Are	D-Restricted Ltd, sole director and practitioner Diana Warren. Provides clinical tongue-tie (frenulotomy) services.
Purpose of Data Collection	To deliver safe, effective care for parent-infant dyads, ensure continuity of care, maintain records for legal/regulatory compliance.
Types of Information Collected	Clinical records (assessments, feeding notes, procedures), consent forms, correspondence, photographs/videos (with consent), CCTV for premises security.
How Data is Used	Administration of care, communication with GPs or relevant professionals (if required), auditing, anonymised research, safeguarding concerns.
Data Sharing	Data is not shared with third parties except: with GP for continuity of care, or with authorities if safeguarding or legal obligations arise.
Data Storage & Security	Active electronic records stored on encrypted devices with password/fingerprint protection; backups maintained on secure NAS. Paper records stored in locked, fireproof cabinets; CCTV and alarm systems secure premises.
Retention Periods	Records retained for 25 years post last contact; securely destroyed thereafter (shredding, deletion, secure disposal).
Access to Records	Parents/caregivers can request copies in writing with ID; provided within 10 working days. Records remain accessible even if the business ceases; ICO provides guidance for access.
Online Submissions	Website forms handled via Wix.com (data processor, GDPR-compliant). Payment processing via Stripe (PCI DSS-compliant).
Cookies	Cookies used to improve user experience, store preferences, anonymised analytics. Can be disabled via browser settings.
Photographs/Videos	Taken with parental consent for clinical, training, or educational purposes only. Stored securely and deleted periodically.
Your Rights	Right to access, correct, or request deletion of data; right to withdraw from future communications.
Complaints	Complaints regarding data handled via D-Restricted Ltd, or escalated to the ICO if unresolved.
Policy Updates	Policy may be updated periodically; latest version available on D-Restricted Ltd websites.