



How we look after *your information*

Our privacy notice — what we hold, why we are allowed to, who sees it, how long we keep it, and what you can ask us for.

You tell us things you tell almost no one else, and you let us photograph your mouth and your face. This explains what we do with that — and what we never do with it.

Truly — Privacy Notice · Version 4.0 · Last updated 13 March 2026
Replaces our Privacy Policy of 4 July 2024



Who we are

Truly is a group of dental practices trading as **Truly**, **Truly Dental** and **Dame Street Dental Hospital**. Each practice is operated by its own company within the group.

The company responsible for your information is **the company that operates the practice you attend**. All of them are owned by **Hiltattum Limited**, registered in Ireland under company number **718840**, registered office **16 Dame Street, Dublin 2, D02 TD50**. Our United Kingdom practices sit under **Hiltattum UK Limited**, registered in England and Wales under company number **15881981**, registered office **128 City Road, London, EC1V 2NX**.

If you would like to know the exact company that holds your records, ask us and we will tell you. It takes one email.

Who to contact about your information

DATA PROTECTION LEAD

Mags Simpson

VP of Operations

dataprotection@trulydental.ie

mags@trulydental.ie

+353 83 079 4866

Day-to-day responsibility for data protection across the group. If you are ever told we cannot say who deals with data protection, that is wrong — write to her directly.

DEPUTY

Noel Hayes

Chief Customer Officer

noel@trulydental.ie

Acts when the Data Protection Lead is unavailable, so nothing waits.

You can also write to us at **Data Protection, Truly, 36/37 Dame Street, Dublin 2, D02 EF64**, or telephone **(01) 525 2670**.

Our United Kingdom practices. Truly Manchester is operated by **Capital Care Manchester Limited** (company number 16064606), registered with the Information Commissioner's Office under reference **ZB825663**. Truly Glasgow is operated by **Capital Care Glasgow Limited** (company number SC585407), ICO reference **ZA505767**. Truly London is operated by **Mouth (Nine Elms) Ltd** (company number 12333857), which is jointly owned by our group and Dental Beauty Group Ltd. The same Data Protection Lead acts for all of them.

We do not sell your information, and we never give it to anyone for their own marketing.

What we hold

- Your name, date of birth, address, telephone and email, and next of kin.
- Your medical history, medications and allergies.
- Our examination findings, diagnoses, treatment plans, charting and clinical notes.
- Radiographs, photographs, scans, smile designs and laboratory files.
- Your consent records, appointments, payments and any insurance or scheme claims.
- Our correspondence with you — letters, emails, text messages and notes of calls.
- Where relevant, records of any concern or incident involving your care.

Where it comes from

Most of it comes from you. Some of it comes from other people, and you are entitled to know which:

- **A dentist or doctor who referred you** — referral letters, history and radiographs.
- **A previous dental practice** — your transferred records.
- **A dental laboratory** — design files and device records.
- **Your insurer or dental plan provider** — eligibility and claims information.
- **A parent, guardian or carer**, where they act for you.
- **The HSE or the Department of Social Protection**, if you are treated under the medical card scheme or the PRSI Treatment Benefit Scheme.

Why we are allowed to hold it

Health information needs two things under data protection law: a lawful basis, and a second condition specific to health data. Ours are:

What we are doing	Why we are allowed to
Providing your dental care	The contract between us, together with the condition permitting processing for the provision of health care or treatment — which is available only where your information is handled by, or under the responsibility of, someone bound by professional confidentiality. That is how we control who can see it.
Keeping your records for as long as we must	Our legal and professional obligations , and our legitimate interest in being able to answer questions about your care later.
Clinical governance, audit and improving what we do	Our legitimate interests , and the management of health care services.
Fees, billing and any scheme claim	The contract between us, and our legal obligations .
Handling a concern or complaint	Our legal obligations and legitimate interests.
Using your photographs in our marketing	Your explicit consent — and only that. See below.
Protecting a child or an adult at risk	Our legal obligations , and where necessary protecting someone's vital interests.

Who we share it with

- Dental laboratories making your appliances — usually under a case reference rather than your name.
- Other clinicians involved in your care, with your agreement.
- Our practice management, imaging and IT providers, under contracts binding them to our instructions.
- Your insurer or plan provider, where you are claiming.
- The HSE or the Department of Social Protection, for scheme treatment.
- Our professional advisers and indemnifiers, where necessary.
- Regulators or courts, where the law requires it.

Where it is held

Within the European Economic Area, or in the United Kingdom, which the European Commission has formally recognised as providing an adequate standard of protection. If your information ever goes anywhere else, we use safeguards formally approved by the European Commission or, for our UK practices, by the Information Commissioner.

How long we keep it

Record	How long
Adult dental records — Ireland	At least eight years after we last saw you, as the Dental Council requires.
Adult dental records — United Kingdom	Eleven years after your last course of treatment, following the national records management benchmark.
Children and young adults	Until at least your 25th birthday , or your 26th if you were 17 when we last saw you.
Consent forms for photographs used in marketing	For as long as the image is in use, plus six years.
Records of a concern or complaint	Ten years from when it was closed.
Financial records	Six years, or longer where tax law requires.

Our full retention schedule covers everything else and we will share it on request.

Photographs and video

We take clinical photographs as part of your treatment — for planning, for the laboratory, and to record how things change over time. That is part of your dental record and it is covered by the same rules as the rest of it.

We will never use your image in any advertising, website, social media or printed material unless you have signed a separate consent form for that specific use.

We ask **after** your treatment has finished, on a form of its own — never bundled into your treatment consent — and we will show you exactly which images we mean. You can agree to some uses and not others.

Saying no will not affect your care, your fees or your appointments in any way. Nor will changing your mind later.

If you change your mind

Tell us — dataprotection@trulydental.ie — and you do not have to give a reason. We will then:

- stop using the material immediately, including pausing any live campaign;
- **remove it within five working days** from every website, every social media account, every video platform, and any printed material;
- instruct any agency we use in writing and obtain written confirmation that they have deleted their copies;
- **write to you confirming exactly what was removed and from where** — item by item, not a general assurance; and
- flag your record so that no future campaign can ever select you.

To be clear about what removal means to us: setting something to "unlisted", "private" or "archived" is **not** removal. It gets deleted.

Your rights

You can ask us	And we will
For a copy of everything we hold about you	Provide it, free of charge , normally within one calendar month. In a usable electronic format if you would prefer — you should not have to come in and collect it.
To correct something	Correct anything factually wrong, promptly. Where you disagree with a clinical opinion we have recorded, we will record your disagreement alongside it rather than alter the original note.
To delete something	Do so where we can. We usually have to keep your dental records for the periods above, and if that applies we will explain why in writing.
To restrict what we do with it	Do so, and flag your record accordingly.
For it in a portable format	Provide it.
To stop using it for marketing	Stop. This right is absolute — there are no exceptions and we will not ask you to justify it.
To withdraw a consent you have given	Act on it, at any time, as easily as you gave it, free of charge, and with no effect whatsoever on your care.

None of these rights can be signed away

No form, agreement or settlement we ever ask you to sign can take them from you. If any document we give you appears to do so, that part of it is not enforceable — and we would like to know about it.

If you were treated at one of our UK practices: where we need to confirm who you are, or need you to tell us more about what you are looking for, the one-month period may start or pause while we wait. We will always tell you if that happens and why. Where we hold a great deal of information about you, we may ask you to help us narrow down what you want. **These provisions apply to our UK practices only and not in Ireland.**

If you are unhappy with how we have handled your information

Please tell us first if you are willing to — dataprotection@trulydental.ie, complaints@trulydental.ie, or Mags Simpson directly at mags@trulydental.ie. We will

acknowledge within two working days, keep you posted on progress, and tell you the outcome.

If you were treated at one of our UK practices, you have a specific legal right to complain to us about how we have handled your information, and we have a legal duty to make that easy, to acknowledge it, to keep you informed and to tell you the outcome. Use the form on our website, email us, telephone us, write to us, or tell any member of our team.

You can also complain to the data protection regulator **at any time**. You do not have to come to us first, and you do not have to wait for us to finish.

IRELAND

Data Protection Commission

6 Pembroke Row, Dublin 2, D02 X963
Also at Canal House, Station Road, Portarlinton,
R32 AP23, Co. Laois

forms.dataprotection.ie/contact

(01) 765 0100

Complaints are made through the online form — the Commission does not take complaints by telephone. Helpdesk 9.30am to 1pm, Monday to Friday.

UNITED KINGDOM

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire
SK9 5AF

ico.org.uk

0303 123 1113

Welsh language 0330 414 6421

Monday to Friday, 9am to 5pm. Live chat available.

Cookies on our website

Our website uses cookies and similar technologies. Some are strictly necessary to make the site work. Others we ask about first.

Type	What we do
Strictly necessary	Set automatically — the site will not function without them.
Analytics — how the site is used	In Ireland we ask your permission before setting these, and you can refuse as easily as you can accept. For visitors to our UK site we use them to measure how the site is used so we can improve it, and you can object at any time using the link in our cookie policy.
Advertising and tracking	Set only if you agree , wherever you are.

Our cookie policy lists every cookie we use, what it does, how long it lasts and who provides it. You can change your mind at any time, and we will ask you again at least every six months.

Changes to this notice

We review this notice every year and update it whenever the law or what we do changes. This version was last updated on 13 March 2026 and replaces our Privacy Policy of 4 July 2024.

In future we may be required by law to share your records with other providers involved in your care. If that changes, we will update this notice and tell you.

truly

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Truly, 36/37 Dame Street, Dublin 2, D02 EF64 · Hilttatum Limited, CRO 718840
Published alongside our Complaints Procedure and our Duty of Candour.