

Privacy Policy – Patients and Service Users

1. Introduction and Purpose of this privacy notice

This privacy notice gives you information on how ID-Medical collects, processes and protects your personal data. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide so that you are fully aware of how and why we are collecting and using your data.

We can only provide our services fully if the personal data we hold about you is accurate and up to date. Please keep us informed or update your details if your situation changes.

While our website is not intended for use by children we do collect data relating to children.

ID-Medical Group Ltd. ID House - 1 Mill Square - Wolverton Mill South - Milton Keynes - MK12 5ZD – Company Number: 3829536 is the Data Controller and is responsible for your personal data (collectively referred to as 'ID Medical', 'we', 'us' or 'our' in this privacy notice).

2. Why we Collect Your Personal Information

We keep detailed information and records about you to ensure:

- Clinical professionals involved in your care have access to accurate and up-to-date information about your medical history
- We are able to quickly and accurately assess your needs and provide excellent care
- Any concerns you may have or complaints you may raise can be properly investigated
- Continuity of care can be maintained should you:
 - Move to another area
 - Need the provision of different services
 - Seek the input of a different healthcare professional

3. What information we hold about you

We collect personal information about you when you are referred to our services. The information you provide is treated in accordance with current UK data protection legislation. The information collected includes:

- Identity Data e.g. name, date of birth, NHS number, NI number, gender, profession, driving licence (photo ID)
- Contact Data e.g. address, email address, phone number(s)
- Contact History e.g. previous appointments, contact log, correspondence
- Medical history e.g. notes and reports on health, details of care and treatments, images, test results, medicines, side effects, allergies
- Miscellaneous – relevant information from people who provide care and know you well e.g. healthcare professionals and relatives

4. Consent and Communications

We care about the privacy of our users. As outlined below, we collect, use and share personally identifiable information and non-personally identifiable information. By providing your details and using the website for example, you agree to the collection of such information and to have your personal data and that of any person using your account collected, used, transferred and processed in accordance with this Privacy Policy. The purpose for being contacted is for the purpose that the information was collected for.

You can withdraw or amend your consent for us to contact you at any time via our website or by contacting us using the contact details below. Please note that some consent is required to fulfil the purpose of providing our clinical services.

As part of our overall strategy to improve services we may incorporate 'Tracking Pixels' into our communications. This allows us to identify, for example, if an email has been opened.

5. How and when we use your personal data

We will only use your personal data where we have a legal basis to do so i.e.

- Where we have obtained your consent to process your personal data
- Where ID Medical has a legitimate interest and your rights do not override these interests. This would typically be where we are investigating, assessing or conducting medical conditions and their treatment(s).
- Where we need to comply with legal or regulatory obligations. This would typically be to fulfil e.g. General Data Protection Regulation (GDPR) or Care Quality Commission (CQC) requirements in line with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (Part3)
- Where we need to fulfil a contract we have entered into with you.

Your personal data is stored securely on servers based in the UK. ID Medical does not transfer any personal data outside of the EEA.

We will use your personal data to:

- Ensure that treatments and advisory services are based on accurate and up-to-date information
- Correspond with other healthcare professionals e.g. your GP regarding your treatment unless advised otherwise
- Work effectively with other healthcare providers to ensure a joined-up approach
- Monitor the quality and outcomes of care provided to continually improve the service
- Investigate and address any concerns or complaints made about your healthcare
- Provide information required for financial transactions e.g. private insurance claims.

6. Data Sharing

We may share your personal information with a member of our group, which means subsidiaries, and any ultimate holding company and its subsidiaries, as defined in section 1159 of the United Kingdom Companies Act 2006.

6.1 Sharing information with selected third parties including:

- NHS hospital Trusts and healthcare professionals e.g. pharmacists, radiology, pathology staff for the purpose of assessing, diagnosing and treating medical conditions
- Other private sector organisations, local authority departments, voluntary organisations involved in your care
- Other healthcare organisations e.g. if your treatment is to continue with another provider. If the other healthcare provider is outside of the EEA then best endeavours will be made regarding the most appropriate and secure transfer of your personal data as defined within the Data Protection Act 2018
- Aggregate, anonymous information about our users to analytics and search engine providers that assist us in the improvement and optimisation of the website.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply these notices, terms and other agreements; or to protect the rights, property or safety of those with whom we do business, or others. This includes exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

We may also disclose aggregate, anonymous statistics about visitors to the website (users and transactions) in order to describe our services to prospective partners (advertisers, sponsors) and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

6.2 Sharing information with nominated individuals

We will normally share information regarding your treatment and the progress of your care with a nominated individual or individuals. This is normally your emergency contact, family member(s) or someone/people you feel close to.

By providing their details you are providing consent for us to keep them informed regarding your treatment and progress.

You can withdraw this consent at any time simply by letting us know.

6.3 Sharing information when legally obliged to do so

There are a few situations whereby we have a legal obligation to share personal information e.g. when a court order instructs us to do so, in the case of reporting an infectious disease, or to safeguard adults and/or children.

7. Third Party Links and International Transfers

The website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check the policies of these websites before you submit any personal data.

ID-Medical does not transfer or store any personal data outside the European Economic Area (EEA). Your personal data may be processed by ID Medical (India) LLP operating outside the EEA. ID Medical (India) LLP staff log into UK based servers and are required to adhere to the same data protection protocols as our UK based staff. ID Medical (India) LLP operates as a Data Processor within strict operational requirements as detailed in a Data Processor agreement.

8. Your Rights

You have a number of rights as outlined below. When exercising these rights we will need to validate your identity to ensure the request is from you. This is a security measure to ensure personal data is not disclosed to an unauthorised third party. You may exercise your rights by contacting us via the contact details below.

8.1 Right to be informed

Your 'Right to be Informed' encompasses the right to be provided with 'fair processing information' to ensure transparency over how your personal data is used. This is included in this Privacy Notice and our Terms and Conditions. The information provided should be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, and
- free of charge.

8.2 Right to Restrict Processing

You have the right to ask us not to process your personal data for e.g. marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at marketing@id-medical.com.

8.3 Right of Access

You have the right to access the information we hold about you. An access request is free of charge unless considered repetitive or excessive when a small admin charge may be made. A request for access can be made via the contact details below.

8.4 Right of Rectification

You are entitled to have your personal data corrected if it is inaccurate or completed if incomplete. If the personal data in question has been disclosed to third parties, we will inform them of the rectification where possible and confirm with you which third parties the data has been disclosed to.

8.5 Right to Erasure

You have the right to request the deletion of personal data where there is no compelling reason for its continued processing. There are some circumstances where this right may not be met and a request refused e.g. to comply with a legal obligation such as HMRC or framework retention requirements (see Data Retention below for more details).

8.6 Right to Data Portability

The right to data portability allows you to obtain and reuse your personal data. It allows you to move, copy or transfer personal data easily in a safe and secure way, without hindrance to usability.

The right to data portability applies to personal data:

- provided by you;
- where you have provided consent for processing or the processing is for the performance of a contract; and
- when processing is carried out by automated means.

8.7 Right to Object

You have the right to object to processing based on the performance of a task in the public interest or processing based on a legitimate interest e.g. direct marketing. An objection must be based on your particular circumstances and processing must cease unless there are compelling reasons otherwise e.g. defence of legal a claim.

8.8 Rights Relating to Automated Decision Making and Profiling

Data protection legislation provides safeguards for individuals against the risk that a potentially damaging decision is taken solely based on automated processing i.e. without human intervention.

ID-Medical employs no fully automated processes that result in particular individuals being impacted.

9. Data Security

We have in place appropriate security measures to prevent your data being accidentally lost, used, accessed in an unauthorised way, altered or disclosed. Access to your personal data is strictly limited to specific authorised individuals who require access to perform their roles.

All data collected and processed by ID-Medical is stored on servers in the UK.

Internal policies and procedures are in place and reviewed regularly to identify and notify of any breaches of these procedures.

10. Data Retention

We will only retain your data for as long as necessary to fulfil the purposes it was collected for and satisfy any legal, accounting or reporting requirements. For example we need to retain your details for 6 years to satisfy HMRC requirements following any financial transactions and some regulators recommend retaining details for 21 years in case of any long term emerging personal injury claims.

Prior to commencing any treatment or clinical procedures with us, by registering your details with us we will, typically, retain your details for a period of three years unless you request that they be deleted. In this instance we will anonymise your data so that it cannot be associated with you and retained securely for statistical research purposes.

11. Contact us

We have appointed a Data Protection Officer who is responsible for overseeing questions relating to this privacy notice. If you have questions about this privacy notice including requests to exercise your legal rights, please contact the DPO using the contact details below.

Contact via the website or by email is encrypted and none of the data you supply will be stored by the website or passed to or processed by a 3rd party processor.

To contact us, please visit our website: www.id-medical.com or e-mail as follows:

- General enquiries: clinicalservices@id-medical.com
- Data Protection Officer: dpo@id-medical.com

Or telephone: (0)1908 552 820

12. Complaints

Should you have cause to make a complaint or express dissatisfaction with ID-Medical, a member of its staff or processes, please email or telephone our Complaints Team at: complaints@id-medical.com / 01908 552820. A member of our Complaints team will address your concerns as appropriate.

Should you feel that your concern has not been resolved satisfactorily you also have the right to direct your complaint to the supervisory authority – contact details below.

13. Supervisory Authority and Data Breaches

The relevant supervisory authority for data protection legislation in the UK is the Information Commissioners Office (ICO). Their contact details are:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

Tel: 0303 123 1113 (local rate)

Website: <https://ico.org.uk>

ID-Medical has designed the protection and security of data protection into its systems, processes and staff knowledge. In the event that a breach of data protection is identified, the circumstances are logged and appropriate actions taken including informing the individuals concerned and the supervisory authority. Each case is considered separately and depends on the risk to the rights and freedoms of the individual(s) impacted.