

Privacy Notice

Our Privacy notice will be a statement and describe to our patients, carers, visitors, the general public and staff how we collect, use, store, retain and disclose the personal data and information that we hold.

The following Privacy Notice forms a part of our ongoing commitment to the fair and lawful processing of all personal data.

We are governed by the following guidelines and legislation:

Data Protection Act 1998

General Data Protection Regulations (GDPR) 2018

Access to Health Records Act 1990

Freedom of Information Act 2000

Public Records Act 1958

Copyright Design and Patents Act 1988

International Organisation for Standardisation (ISO) – Information Security Management

We are governed by The Regulation and Quality Improvement Authority (RQIA) and copies of current inspection reports are available via their website.

<https://www.rqia.org.uk/>

Our Health Care Professionals including Consultants, Doctors, Nurses, and support staff are also regulated and governed by appropriate professional bodies.

What information do we collect about you and why?

3fivetwo Group process personal information and data in order to enable us to support the provision of healthcare services to patients, maintain our own accounts and records, promote our services, and to support and manage our employees. We also process personal information about health care professionals that deliver services throughout the organisation.

We also use information to support and monitor our services to enable the delivery of high quality healthcare. This type of information will usually be provided in an aggregate or anonymised form, so that we cannot identify an individual.

3fivetwo Group may ask for and hold various details of personal information regarding yourself which will be used to aid in the delivery of appropriate care and treatment. We have set out further information below as to the types of personal information we hold and the legal basis for processing this information:

Personal information	Legal basis for processing ¹
Basic Personal details such as your name, address, date of birth, email address, phone number, current General Practitioner (GP) details and next of kin and family details such as dependants	This information is processed so that we can enter into and perform our contract with you.
Any contact we have had with you such as phone calls, emails and any appointments attended	This information is processed so that we can perform our contract with you; and for our legitimate interests , being to ensure quality assurance, for security and monitoring reasons, to maintain our business records and to develop and improve our products and services and monitoring outcomes.
All details relating to any treatment and further care, including all notes and reports relating to your health	This information is processed so that we can perform our contract with you.
All Healthcare results such as X-ray, CT or MRI results, blood tests etc.	This information is processed so that we can perform our contract with you.
Information received from other people who may care for you such as healthcare	This information is processed so that we can perform our contract with you.

¹ Update / amend legal basis (or bases) as appropriate.

<p>professionals e.g. your GP or other treating physicians and/or relatives</p> <p>Any subscriptions or memberships i.e. sports club or trade union membership or payment plan subscription</p>	
<p>Education, training, mostly frequently of clinicians such as GPs</p>	<p>This information is processed so that we can perform our contract with you.</p>
<p>Employment details, for example for those that work for us either directly or are commissioned by us to provide a service</p>	<p>This information is processed so that we can perform our contract with you.</p>
<p>Marketing preferences and services, for example details of the services access or offered by providers</p>	<p>This information is processed for our legitimate interests (to keep our records updated and to study how customers and patients use our products/services, to develop them and to grow our business).</p>
<p>Visual images, personal appearance and behaviour, for example if CCTV images are used as part of building security</p>	<p>This information is processed for our legitimate interests, being to ensure our premises are safe and to prevent and detect crime on our premises.</p>
<p>Responses to surveys, where individuals have responded to surveys about healthcare issues</p>	<p>This information is processed for our legitimate interests, namely to keep our records updated and to study how customers and patients use our products/services, to develop them and to grow our business.</p>
<p>User IP addresses in circumstances where they have not been deleted, clipped or anonymised</p>	<p>This information is processed for our legitimate interests.</p>
<p>Your financial information such as your bank account details and details set out on your chosen credit, debit or other payment card and, where relevant, financial information relating to your insurer or sponsor.</p>	<p>This information is processed so that we can perform our contract with you.</p>
<p>Any further information that you choose to tell us</p>	<p>This information is processed so that we can perform our contract with you; and for our legitimate interests.</p>

The following may also be collected in certain circumstances:

- More sensitive personal data such as race, ethnic origin, political and religious beliefs, sex life, sexual orientation, genetic data and biometric data
- Further health related information such as whether or not you have a disability or other health conditions, such as allergies

The legal basis upon which we rely for holding this information is to allow us to perform our **contract** with you.

The information and data described above is collected in a number of different ways and can include:

- Information directly given to us by yourself
- Information provided from other healthcare professionals such as treating consultants or your GP
- Information received from Northern Ireland Health and Social Care Trusts
- Marketing opt ins
- Completed satisfaction surveys

Subject to applicable laws, we monitor and record staff calls, emails, text messages and other communications in relation to our dealings with you and we may also monitor activities on our networks and systems, where necessary. We do this so as to ensure an appropriate standard of care, for regulatory compliance, self-regulatory practices, crime prevention and reduction, to protect the security of our communications, networks and systems, for quality control and staff training and when we need to retain a record of what has been said. Such monitoring is carried out for our legitimate interests and to ensure compliance with legal obligations.

How your Information and Data is used:

- To ensure that you receive safe, effective and appropriate treatment
- To assist in decision making surrounding your care
- To ensure effective working with other organisations e.g. the Health and Social Care Trusts, who may be involved in your care
- To ensure that our services meet your current and any future needs
- To ensure that the care we provide is to the highest standard and can be reviewed as necessary
- To provide you with any goods and/or services that have been ordered

- To contact you with regards to any enquires that have been made
- Marketing activities for example to send you other 3fivetwo Healthcare Group information such as courses, newsletters or product releases that we feel may be of interest to you
- For Research and Audit purposes
- To prepare statistics on performance
- In order to train Healthcare Professionals and support staff
- To help us to establish, exercise, or defend legal claims

How your Information and Data is kept safe, confidential and retained:

To protect your confidentiality it is important to us that all of your information is kept safe and secure.

Information and data that is collected is kept within secure paper and electronic records. Access to these records is restricted to only those who require access.

The Data Protection Act 1998 and as of 25th May, GDPR, regulate the processing of personal information and data. The strict principles within these Acts govern our duty and our use of any data. 352 Medical Limited is registered with the Information Commissioner's Office (ICO) and details of this can be found on their website:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Our registration number: Z1431766

The use of Technology allows us to protect personal data in various ways, including the restriction of access. When keeping your information safe, our guiding principle is that we are holding your data within the strictest confidence.

Everyone that works within 3fivetwo Group is subject to the Common Law Duty of Confidentiality, the Data Protection Act 1998 and GDPR 2018.

Information that is provided to us in confidence will only be used for the purpose that it was collected for, unless there are other circumstances which are covered by law.

All 3fivetwo Staff are required to undertake training in Data Protection/GDPR, Confidentiality, IT and Cyber Security and other specialist training dependent on job role.

Who will your Information and Data be shared with:

To enable us to fulfil our duties and ensure that the best care possible is provide we will need to share information about you with others. We may need to share your information with a range of other parties including Health and Social care organisations and regulatory bodies. You may be

contacted by any one of these organisations for a specific reason, the organisation will have a duty to be able to tell you why they are contacting you.

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of organisations:

- The RQIA
- PHIN
- The NHS
- The HSE
- Any of our 3fivetwo group companies
- Third party service providers who perform functions and tasks on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions, software providers and IT consultants)
- Third party outsourced IT and document storage providers where we have an appropriate agreements and protections in place

Where sharing patient information is shared with other organisations, an information sharing agreement will be drawn up to ensure that all information that is shared is done so in a way which complies with all relevant legislation.

Your right to withdraw consent:

You have the right to refuse and/or withdraw you consent to information sharing at any time. You will have any possible consequences of this fully explained to you. This could include delays in you receiving relevant care.

Contacting us regarding your Information and Data:

One of the main objectives of GDPR is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

Within 3fivetwo Group there is a senior person who has responsibility for protecting the confidentiality of all of your information.

Under GDPR this person is known as the Data Protection Officer (DPO). They can be contacted with any queries relating to your Data and how this is being used.

Data Protection Officer

Jennifer McLaughlin

mclaughlinj@3fivetwo.com

Under The Data Protections Act 1998 and GDPR any person may request access to the information (with some exemptions) that is held about them.

Data Subject Access Requests (DSAR):

Within the law you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:

- You may be asked you to verify your identity, or we may ask you for more information about your request
- Where we are legally permitted or obliged to do so, we may decline your request, if this is the case you will receive an explanation why if we do so.

Right to erasure:

In some situations (for example, where your data has been processed unlawfully), you have the right to request us to "erase" your personal data.

Your request will be responded to within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree if certain limited conditions apply.

Once your request has been agreed, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. This will in turn minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

You can unsubscribe to our marketing at any time by contacting us and letting us know your preference.

Right of data portability:

If you wish, you have the right to transfer your data from us to another data controller. We will be able to you help with this. This can be done by either directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

Right to lodge a complaint with a supervisory authority:

You also have the right to lodge a complaint with your local supervisory authority, details of which can be found below:

The Information Commissioner's Office:

0303 123 1113

casework@ico.org.uk

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

How do we store and transfer your Information and Data internationally?

In order for us to operating in the most efficient way, it is possible that we may have to transfer or store your data internationally.

It is important to us to make sure that your data are stored and transferred only in ways which are secure. Therefore we will only transfer personal data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
 - by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
 - transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
 - where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a Client of ours); or
 - where you have consented to the data transfer.
- To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

Changes to the 3fivetwo Privacy Policy:

Any changes to this Privacy Policy will be posted on our web site (<http://3fivetwo.com/group/privacy>) so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.