

Privacy Notice
Brewer Street Surgery

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1. Introduction

This Privacy Notice has been written in line with the EU General Data Protection Regulation (GDPR) 2016, Data Protection Act 2018 and guidance from the [Information Commissioner](#) (IC).

2. What is this Privacy Notice about?

Privacy Notice is the conditions which have to be met for any activity involving personal data or special categories of personal data to be lawful. Being transparent and providing accessible information to individuals about how an organisation will use their personal information is a key element of data protection legislations. The most common way to provide this information is in a Privacy Notice.

This Privacy Notice tells you about information we collect and hold about you, the legal bases for collecting and holding the information, what we do with it, how we keep it secure (confidential), who we might share it with and what your rights are in relation to your information.

3. Who we are

Brewer Street Surgery is a General Practice providing general medical services for the local population.

4. Types of information we use

We use the following types of information/data:

- Personal data or sensitive personal/special categories of personal data such as:
 - demographics – name, address, date of birth, postcode, NHS number
 - racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, medical/health data, sexual life or sexual orientation data.
- Pseudonymised - about individuals but with identifying details (such as name or NHS number) replaced with a unique code.
- Anonymised - about individuals but with identifying details removed.
- Aggregated - anonymised information grouped together so that it doesn't identify individuals.

5. What we use your personal data and special categories of personal data (known as or sensitive personal) for

We use and share information about you in a number of ways. These include:

Primary uses - information from your GP medical record which can be made available to other NHS and public sector organisations, including doctors, nurses and care professionals in order to help them make the best informed decision, and provide you with the best possible direct care delivery.

Secondary uses - information from your GP medical record involves extracting identifiable data and (usually) sharing that data with other NHS organisations, for the purpose of indirect care. Examples include using your information for [research](#), auditing, and healthcare planning (population health management).

6. Our identity and contact details

Brewer Street Surgery
4 Brewer Street
Maidstone
ME14 1RU 01622 755401 brewer.street@nhs.net

7. Our Data Protection Officer

Pam Ashe DPO Kent & Medway
ICB Corporate Generic inbox name: kmicb.ig@nhs.net
GP DPO generic inbox for GP practices : kmicb.gdpoteam@nhs.net

8. Organisations we share your personal information with

We share information about you with other GPs, NHS acute or mental health Trusts, local authority, community health providers, pharmacists, commissioning organisations, medical research organisations and some specific non NHS organisations for the purposes of direct and indirect care delivery of care.

We are required under the law to provide you with the following information:

- How we process your personal data;
- the purpose of processing;
- recipient/categories of your personal data;
- the identity of our Data Protection Office;
- how long we retain personal information about you;
- the lawful bases for the sharing/processing and,
- your rights - to view, request access copies of your personal information, or object to the processing.

Included below is a table of the organisations we share information about you with split into the following categories. **In all cases, Controller and Data Protection Officer are as listed in section 6 and 7 above:**

- | | | |
|----|--|------------------------------|
| a. | Direct Medical Care and Administration | Error! Bookmark not defined. |
| b. | Other primary care services delivered for the purposes of direct care | Error! Bookmark not defined. |
| c. | Statutory Disclosures of Information | Error! Bookmark not defined. |
| d. | Processing for the Purposes of Commissioning, Planning, Research and Risk Stratification
Error! Bookmark not defined. | |
| e. | Data Sharing Databases | Error! Bookmark not defined. |
| f. | Data Processors | Error! Bookmark not defined. |

a. Direct Medical Care and Administration

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing and data retention periods	Lawful basis General Data Protection Regulation - <i>Article 6</i> - - <i>Article 9</i> - Data Protection Act - <i>Section 8</i> - - <i>Section 10</i> - - <i>Part 1 of Schedule 1</i> -	Your Rights
NHS Trusts – Hospitals, Community or Mental Health Trusts.	Personal data concerning your GP medical record may be shared with NHS Trusts in order to enable their healthcare professionals make the best informed decision about your health needs, and provide you with the best possible care if you visit the hospital for routine care and referrals. Your personal information may also be processed for local administrative purposes such as: • Waiting list management; • local clinical audit; • Performance against local targets; • activity monitoring; • production of datasets to submit for commissioning purposes and national collections.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21 and DPA Section 99, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and

	The source of the information shared in this way is your electronic GP record. In accordance with DPA Part 1, Schedule 1 (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: Common Law of Duty of Confidentiality	compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Emergency Services (Ambulance trusts, police, A&E departments, out of hours services, 111)	There are circumstances when intervention is necessary in order to save or protect a patient's life or to prevent them from serious immediate harm, for example, during a collapse or diabetic coma or serious injury or accident. In many of these circumstances the patient may be unconscious or too ill to communicate. Medical professionals have a duty of care to share data in emergencies to protect their patients or other persons. In these circumstances, your GP medical record will be shared with emergency healthcare services, the police or fire service in order to enable you	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions:	You have the right to: • Make pre-determined decisions about the type and extent of care you will receive in an emergency, these are known as "Advance Directives"; • access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for

	receive the best treatment or service. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; Article 9 (2) (C) – the processing is necessary to protect the vital interests of the data subject; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. In accordance with DPA Schedule 1, Part 3, (30) (b) the conditions for protecting individual’s vital interests is met where the data subject is physically or legally incapable of giving consent.	the purposes of the processing. Right to object: You have the right to object to some or all of your personal information being shared with the recipients. You also have the right to have an “Advance Directive” placed in your records and brought to the attention of relevant healthcare workers or staff. We will notify you at the earliest opportunity where we have shared your personal data in an emergency situation. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
GP Federations (groups of GP practices working together)	GP Federations are groups of GPs (patient centered organisation), working collaboratively and developing closer integration with other partners across health, social and third sector	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your

	partners to facilitate an enhanced delivery of health and care services. Through various hubs in the community the GP Federation provide direct health and care services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across West Kent. If you visit receive treatment/consultation on any of these services, personal data concerning your GP medical record may be shared with the GP Federation and their Multidisciplinary Team (MDT) in order to enable them make the best informed decision about your health/care needs, and provide you with the best possible care. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire
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Pharmacists - Medicines Optimisation	Medicines optimisation looks at the value which medicines deliver, making sure they are clinically-effective and cost-effective. It is about ensuring patients get the right choice of medicines, at the right time, and are engaged in the process by their clinical team. Medicines optimisation enables community pharmacies to request medication electronically from the Practice and view relevant information from your GP record in order to provide you with the best medicines. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. <u>Related Legislation:</u>	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office

		Common Law of Duty of Confidentiality	Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Local Authority – Social Services	Brewer Street Surgery works closely with Local Authorities to support and care for people of all ages to deliver the best possible social care. Personal data concerning your GP medical record may be shared with Local Authorities and Multidisciplinary Team (MDT) delivering social care in order to enable them make the best informed decision about your social care needs if required. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the <u>Records Management Codes of Practice for Health and Social Care</u>.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; GDPR Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the

		social care, or the management of health care systems or services or social care systems or services. In accordance with DPA Part 1, Schedule 1, (1a) the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Care Homes	Personal data concerning your GP medical record may be shared with Care Homes and other Multidisciplinary Team (MDT) delivering care in order to enable their care professionals make the best informed decision about your care needs, and provide you with the best possible care if you visit a Care Home. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal

		<u>purposes;</u> <u>In accordance with DPA Schedule 1, Part 1, (2) -health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u>	obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
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b. Other primary care services delivered for the purposes of direct care

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing and data retention periods	Lawful basis General Data Protection Regulation - <i>Article 6</i> - - <i>Article 9</i> - Data Protection Act - <i>Section 8</i> - - <i>Section 10</i> - - <i>Part 1 of Schedule 1</i> -	Your Rights
Integrated Urgent Care Service (IUC) - covering Out of Hours	Integrated Urgent Care Service (IUC) is an urgent care service delivered across Dartford,	The processing of personal data is permitted under the following GDPR and DPA	You have the right to: To access, view or request copies of your

and NHS 111 service	Gravesham, Swanley, Medway, Swale, East and West Kent for the provision of a functionally integrated 24/7 urgent care access, clinical advice and treatment service for patients. IUC incorporates NHS 111 and Out of Hours (OOH) services, which is often referred to as an IUC Clinical Assessment Service. The purpose of IUC is to ensure that patients receive the best possible healthcare service in their community. If you visit the urgent care centre or call NHS 111 for health related needs, personal data in your GP record will be shared with healthcare professionals in order to enable them make the best the best informed decision about your health needs. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) -health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. <u>Related Legislations:</u> Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);	personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire
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Continuing Health Care (CHC)	NHS Continuing Health Care (CHC) is free care outside of hospital that is arranged and funded by the NHS to support living with complex medical conditions and on-going healthcare needs which can be delivered in the patient's home, at their care home or in non-acute hospitals. CHC is free, unlike support from social services for which a fee may be charged, depending on your income and savings. CHC is different from NHS Funded Nursing Care, which some people with less complex needs living in care homes receive. If you require CHC needs personal data concerning your GP medical record will be shared with the care home or in non-acute hospitals looking after you. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office

		Related Legislations: Common Law of Duty of Confidentiality; Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);	Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
National Diabetes Prevention Programme.	NHS England has commissioned a provider, Xyla Health and Wellbeing, to provide the ‘Your local Healthier You: NHS Diabetes Prevention Programme’ for patients at risk of type 2 diabetes. Once a patient is referred, they will be contacted for a motivational interview with the provider (Xyla) to help them enrol onto the course and to have an opportunity to ask any questions they have at this time, including if you don’t want to enrol in the programme. Xyla Health and Wellbeing is part of the Acacium Group and sometimes, if required and legally allowed, Xyla may share some of your basic details such as your name and contact details with providers who have been identified as suitable to contact you to provide support for you during this programme. Any sharing of your data is done as little as possible, under due diligence and in compliance with applicable laws at: https://preventing-diabetes.co.uk/		For full details on how Xyla would use your data for the diabetes prevention programme, see their privacy notice at: https://preventing-diabetes.co.uk/diabetes-prevention-privacy-policy/ For general information on the national diabetes prevention programme, please visit the NHS England website on this

c. Statutory Disclosures of Information

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing and data retention periods	Lawful basis General Data Protection Regulation - Article 6 - - Article 9 - Data Protection Act - Section 8 - - Section 10 - - Part 1 of Schedule 1 -	Your Rights
Safeguarding Concerns – to prevent an individual, or to prevent a serious crime	Some members of public are recognised as needing safeguarding protection, for example children and vulnerable adults. If an individual is identified as being at risk from harm, we have a duty to do what we can to protect that individual, and we are bound ‘Safeguarding’ laws to do so. Where there is a suspected or actual safeguarding issue we will share information that we hold about you with other relevant agencies such as local Ambulance trusts, the police, A&E departments, out of hours services, 111 or Social Services) The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following conditions: Article 9 (2) (c) – the processing is necessary to protect the vital interests of the data subject; Article 9(2) (b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law;	This sharing is a legal and professional requirement and therefore there is no right to object. The Children Act 1989 requires local authorities to investigate where a child is the subject of an emergency protection order, is in police protection or where there is a reasonable cause to suspect that a child is suffering or is likely to suffer harm. The Act requires the local authority to safeguard and promote the welfare of children who are in need, within their geographical area and to request help from specified authorities including General Practices, NHS Trusts, Clinical Commissioning Groups (CCGs) and NHS England. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:

		In accordance with DPA Schedule 1, Part 3, (30) (b) - the conditions for protecting individual's vital interests is met where the data subject is physically or legally incapable of giving consent. In accordance with DPA Schedule 1, Part 2 (18) (1a) - the conditions is met where the processing is necessary for protecting an individual from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual Related Legislations: Section 47 of The Children Act 1989. Section 45 of the Care Act 2014	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
The Care Quality Commission (CQC)	The Care Quality Commission (CQC) is a regulatory body established under the Health and Social Care Act. The CQC regulates health and social care services in England to ensure that safe health and care are provided. The law allows CQC to access identifiable patient data/medical records in our clinical system for the purposes of their assessment and investigation of significant safety incident. The data will be shared with the Care Quality Commission, its officers and staff and members of the inspection teams that visit us from time to time.	The processing of personal data is permitted under the following conditions: Article 6(1) (c) - processing for legal obligation; DPA Section 8 (d) - Processing is necessary for the exercise of statutory functions. The processing of special categories of personal data concerning health is permitted under the following conditions: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate

	The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	and services DPA Section 10 (1) (c) - health and social care purposes. In accordance with DPA Schedule 1, Part 1 (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Law Enforcement and Regulatory Bodies	In some circumstances the Practice may be legally required to share personal information with law enforcements and regulatory bodies (without the consent of the data subject) such as: the Police; Courts of Justice; HMRC and DVLA for the purposes of prevention or detection of crime; apprehension or prosecution of offenders; the assessment or collection of any tax or duty or, of any imposition of a similar nature.	The processing of personal data is permitted under the following conditions: Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - Processing is necessary for the exercise of statutory functions. The processing of special categories of personal data concerning health is	This sharing is a legal and professional requirement and therefore there is no right to object. Personal data processed for these purposes are exempt for the first data protection principle (processed lawfully, fairly and in a transparent manner). Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:

	GPs are obliged to notify the DVLA when fitness to drive requires <i>notification but an individual cannot or will not notify the DVLA themselves</i>, and if there is concern for road safety, which would be for both the individual and the wider public. The Practice will review each request based on its merits before deciding whether to release information to the 'relevant authorities'. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	permitted under the following conditions: Article 9 (2) (G) – the processing is necessary for reasons of substantial public interest In accordance with DPA Schedule 1, Part 2, (10) (1c) – the condition is met where the processing is necessary for the prevention or detection of an unlawful act	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Medico-Legal	Medico-Legal - Where a medical professional is holding personal data for the purpose of providing medical reports in connection with legal action. The source of the information shared in this way is your electronic GP record.	The processing of personal data is permitted under the following conditions: GDPR Article 6(1) (c) - processing for legal obligation; The processing of special categories of personal data concerning health is permitted under the following conditions: GDPR Article 9 (2) (f) – the processing is necessary for the establishment, exercise or defence of legal claims; In accordance with DPA Schedule 1, Part 3, (33) - the conditions for processing for legal claims is met where it is in connection with, any legal proceedings including prospective	This sharing is a legal and professional requirement and therefore there is no right to object. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/

		legal proceedings or; for the purpose of obtaining a legal advice or; establishing exercising or defending legal rights.	
General Medical Council (GMC)	General Medical Council (GMC) is a public body that maintains the official register of medical practitioners within the United Kingdom. Its primary responsibility is ‘to protect, promote and maintain the health and safety of the public’ by controlling entry to the register, and suspending or removing members when necessary. Under the Medical Act 1983, the GMC has the power to request access to a patient’s medical records for the purposes of an investigation into a doctor’s fitness to practise. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of personal data is permitted under the following conditions: Article 6(1) (c) - processing for legal obligation; GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire

		Related Legislation: The Medical Act 1983	Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
The Health Service Ombudsman (HSO)	The Health Service Ombudsman (HSO) was set up by Parliament to provide an independent complaint handling service for complaints that have not been resolved by the NHS in England and UK government departments. The HSO has the power to request access to a patient's medical records for the purpose of an investigation. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of personal data is permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; GDPR Article 6(1) (e) - public interest or in the exercise of official authority; The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow

		Related Legislation: The Health Services Commissioners Act 1993,s12	Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
NHS Counter Fraud	Under the NHS Act 2006, investigations into fraud in the NHS may require access to confidential patient information. This means that we are compelled by the law to share your data. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of personal data is permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: S10 NHS Act 2006	Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
NHS Digital – Statutory Data Collection	NHS Digital is a national information and technology partner to the health and social care system. NHS Digital use digital technology to transform the NHS and social care. NHS Digital carries out National Data	The processing of personal data is permitted under the following condition: Article 6(1) (c) - processing for legal obligation;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information;

	collections/ extraction from the GP record. These include: National Diabetes Audit (NDA) - A national monitoring system, auditing the care of patients with diabetes. The data extracted for the purpose of NDA includes NHS Number, date of birth and postcode, as well as clinical parameters related to diabetes. NDA is a mandatory data extraction under section 259 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data Individual GP Level Data (IGPLD) - A national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients. The data extracted includes the NHS number. IGPLD is a mandatory data extraction under 259 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data FGM) - NHS Digital collects data on FGM within the NHS in England on behalf of the Department of Health (DH). Data collected is used to produce information that helps improve NHS and local authorities to improve on how they support women and girls who have had or, who are at risk of FGM. FGM Enhanced Dataset is a mandatory data extraction under section 259 of the Health and	The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: S259 of the Health and Social Care Act 2012	• restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You do not have the right to object as the sharing is a legal and professional requirement under the law. Whilst there is no right to object when we are complying with a legal obligation, NHS Digital respects Type 1 objections (9Nu0 read codes) present in the GP record and no data will be extracted and uploaded if so. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
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	Social Care Act 2012, this means that we are compelled by law to share your data when required. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care		
NHS England	NHS England is responsible for securing, planning, designing and paying for Primary Care & Specialised NHS services not otherwise funded by Kent and Medway CCGs. This includes planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services. We may often share personal information with NHS England potentially for safeguarding concerns that need escalating beyond our borough. Where required the Practice may also have to share staff personal information with NHS England for the purpose of allegations framework or performers list. The source of the information that may be shared in this instance are in the staff record and patient's electronic GP record.	The processing of personal data is permitted under the following conditions: Article 6(1) (c) - processing for legal obligation; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You do not have the right to object as the sharing is a legal and professional requirement under the law. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.

	Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	social care, or the management of health care systems or services or social care systems or services.	Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
National Cancer Diagnosis Audit (NCDA).	The National Cancer Diagnosis Audit (NCDA) looks at primary and secondary care data relating to patients diagnosed with cancer. It helps to understand pathways to cancer diagnosis, what works well and where improvements could be made. The audit looks specifically at clinical practice in order to understand: • interval length from patient presentation to diagnosis; • use of investigations prior to referral; • what the referral pathways for patients with cancer are and how they compare with those recorded by the cancer registry	The processing of personal data is permitted under the following conditions: Article 6(1) (c) - processing for legal obligation; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You do not have the right to object as the sharing is a legal and professional requirement under the law. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO

		medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Public Health	Public Health England is an executive agency of the Department of Health and Social Care, and a distinct organisation with operational autonomy. The main purpose of the organisation is to protect and improve the health and wellbeing of citizens. These include the management of smoking, alcohol and obesity; management of epidemics and infections such as flu, measles, tuberculosis or outbreaks of food poisoning. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of personal data is permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; The processing of special categories of personal data concerning health is permitted under the following condition: GDPR Article 9(2) (i) – processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices. In accordance with DPA Schedule 1, Part 1 (3) (a) – the condition is met where the	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipient. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.

		processing is necessary for reasons of public interest in the area of public health, and is carried out by or under the responsibility of a health professional, or by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law. Related Legislations: The Health Protection (Notification) Regulations 2010 (SI 2010/659); The Health Protection (Local Authority Powers); Regulations 2010 (SI 2010/657)	Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
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d. Processing for the Purposes of Commissioning, Planning, Research and Risk Stratification

Kent and Medway Clinical Commissioning Groups ICB (s)	Integrated Care Boards (ICBs) are responsible for securing, planning, designing and paying for your NHS services, including planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services. This is known as 'Commissioning'. In order to enable Kent and Medway ICB(s) carry out its statutory responsibilities effectively, efficiently and safely, we may share personal data about you with the CCG for the following purposes: Individual Funding Requests;	The processing of personal data is permitted under the following condition: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	You have the right to: - To access, view or request copies of your personal information; - request rectification of any inaccuracy in your personal information; - restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipient.
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	- Continuing Health Care; - Appeals, queries or compliments; safeguarding concerns; - Commissioning purposes such as payment for target achievement known as Quality and Outcomes Framework (QOF); and where the Practice is participating in agreed national or local enhanced services. The source of the information shared in this way is your electronic GP record. Data retention period: All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.		If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
"Risk Stratification" (Population Health Management and Case Finding) Recipient Optum Health Care Consultants	Brewer Street Surgery performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses i.e. Diabetes, heart disease, risk of falling). Your records may be amongst those searched. This is often called "risk stratification" or "case finding". These searches are sometimes carried out by Data Processors who link our records to other records that they access, such as hospital attendance records. The results of these	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of	You have the right to: - To access, view or request copies of your personal information; - request rectification of any inaccuracy in your personal information; - restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for

Eclipse Health Diagnostics Ltd Apollo Medical Systems Scriptswitch	searches and assessment may then be shared with other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care. Risk stratification can be grouped into two purposes namely: Direct Care – ‘Case Finding’ where carried out by a health professional (e.g. GPs and Provider) involved in an individual’s care or by a data processor acting under contract with such a provider, it is treated as direct care. Indirect Care - understand the local population needs and plan for future requirement. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the <u>Records Management Codes of Practice for Health and Social Care</u>.	personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;</u> <u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u> <u>In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u> Related Legislation: <u>Section 251 NHS Act 2006</u>	the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipient for the purpose of Indirect Care. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: <u>https://ico.org.uk/global/contact-us/</u>
Research Partners	Brewer Street Surgery participates in projects and will only agree to do so if there is an agreed clearly defined reason for the research that is likely to benefit healthcare and patients. Such proposals will normally have a consent process, ethics committee approval, and will be in line with the principles of <u>Article 89(1) of GDPR</u>.	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in the exercise of official authority;</u> <u>DPA Section 8 (d) - processing is necessary for the exercise of statutory functions;</u>	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested,

	Research organisations do not usually approach patients directly but will ask us to make contact with suitable patients to seek their consent. Occasionally research can be authorised under law without the need to obtain consent. This is known as the Section 251 arrangement. We may also use your medical records to carry out research within the practice. We share information with the following medical research organisations with your explicit consent or when the law allows: Clinical Practice Research Datalink. https://www.cprd.com/ The source of the information shared in this way is your electronic GP record. You have the right to object to the sharing of your personal health data concerning your GP medical for research purposes. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the <u>Records Management Codes of Practice for Health and Social Care</u>.	The processing of special categories of personal data is permitted under the following GDPR and DPA conditions: Article 9 (2) (i) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law In accordance with DPA Schedule 1, Part 1, (4) - The condition for the processing is met where it is necessary for archiving purposes, scientific or historical research purposes or statistical purposes; carried out in accordance with Article 89(1) of the GDPR and DPA Section 19, and the processing is in the public interest.	✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipient. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Employment Processing	The Practice ensures the protection of the rights and freedoms in respect of the processing of its employees' personal data, in particular for the purposes of the recruitment, obligations performance contract of employment, rights and benefits management	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority;	Employees have the right to: • To access, view or request copies of their personal information held by the Practice; • request rectification of any inaccuracy to their personal information;

	planning, health and safety, equality and diversity in the workplace, health and safety at work. The Practice ensures that personal data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England). Data Retention Period All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data is permitted under the following conditions: (2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	• restrict the processing of their personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: Employees have a general right to raise an objection to the sharing personal data. If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered. Right to complain: If an employee is dissatisfied with the way Brewer Street Surgery process his/her personal data, they have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
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e. Data Sharing Databases

System/database Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing and data retention period	Lawful basis General Data Protection Regulation - Article 6 - - Article 9 – Data Protection Act - Section 8 - - Section 10 – -Part 1 of Schedule 1 -	Your Rights
The Kent and Medway Care Record	The Kent and Medway Care Record (KMCR) is a single, shared care record for each patient who is cared for by the NHS or social services in Kent and Medway. Relevant information from the record will be able to be seen by all the health and care professionals who need to see it, and patients will be able to access their own records as well. The shared care record includes information about patients/servicer users recorded by acute hospitals, mental health, community health, social care and GP Practices. Healthcare professionals across Kent and Medway are able to access can access subsets of their patients/service users' medical or social records from a single system in order to provide the best possible care. The source of the information shared in this way is your electronic GP record for the	The processing of personal data is permitted under the following GDPR and DPA conditions: Article 6(1) (c) - processing for legal obligation; GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is	You have the right to: - To access, view or request copies of your personal information; - request rectification of any inaccuracy in your personal information; - restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object or opt-out: You have the right to raise an objection to your personal data being shared in KMCR with your Practice. Although we will first need to explain how this may affect the care you receive. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.

	purposes of direct patient care. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care “GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union. Electronic patient records must not be destroyed or deleted for the foreseeable future.”	necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Vision 360 System - Local Record Sharing – Integrated Care:	Vision 360 Practice Access provides secure, remote access to a patient's clinical data including medical history, therapy and test results. It allows Vision and Emis Web Practices you to share, view, record and edit patient consultation details between the two systems irrespective of technological and organisation boundaries. The Vision 360 is used to provide Direct Patient Care for services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across West Kent The information is accessed in real time and	under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipients.

	on-demand, meaning that data from your GP record is neither extracted, nor uploaded, nor sent anywhere in real time and on-demand, meaning that data from your GP record.	DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Healthcare Gateway	Healthcare Gateway is the system supplier of Medical Interoperability Gateway (MIG) that can save hours of clinician time each day by providing healthcare professionals with instant access to real-time information about a patient. The MIG is a secure middleware technology which enables the two-way exchange of patient information between local healthcare settings. This helps the clinicians to make informed treatment decisions faster and improve the efficiency of care by preventing unnecessary hospital admissions/appointments and duplicated tests.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipients.

		treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: Common Law of Duty of Confidentiality	If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
National NHS Digital Services “Spine” including: • Patient Demographics Service • e-Referral Service • Electronic Prescription Service • GP2GP • Summary Care Record	Spine supports the IT infrastructure for health and social care in England, joining together over 23,000 healthcare IT systems in 20,500 organisations. It hosts 5 key services to support the delivery of your care. They enable healthcare professionals, authorised with an NHS smartcard, to view relevant information about you as follows Patient Demographics Service – The Personal Demographics Service (PDS) is the national electronic database of NHS patient details such as name, address, date of birth and NHS	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object or opt-out: You have the right to raise an objection or opt-out of out of having an SCR by returning a completed opt-out form to

	Number (known as demographic information). It helps healthcare professionals to identify patients and match them to their health records. It also allows them to contact and communicate with patients. <u>Summary Care Record (SCR)</u> – is an electronic record of important patient information, created from GP medical records. It can be seen and used by authorised staff in other areas of the health and care system involved in the patient's direct care. When your personal health records on your GP Record is uploaded to the spine, NHS Digital becomes the data controller for the uploaded information. The source of the information shared in this way is your electronic GP record. At a minimum, the SCR holds important information about; • current medication • allergies and details of any previous bad reactions to medicines • the name, address, date of birth and NHS number of the patient The patient can also choose to include additional information in the SCR, such as details of long-term conditions, significant medical history, or specific communications needs.	<u>treatment or, the management of health or social care systems and services;</u> <u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u> <u>In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u>	their GP practice. Although we will first need to explain how this may affect the care you receive. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
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	e-Referral Service - The NHS e-Referral Service (e-RS) combines electronic booking with a choice of place, date and time for first hospital or clinic appointments. Patients can choose their initial hospital or clinic appointment, book it in the GP surgery at the point of referral, or later at home on the phone or online. Electronic Prescription Service - The Electronic Prescription Service (EPS) sends electronic prescriptions from GP surgeries to pharmacies. Eventually EPS will remove the need for most paper prescriptions. GP2GP - GP2GP allows patients' electronic health records to be transferred directly, securely, and quickly between their old and new practices, when they change GPs. This improves patient care by making full and detailed medical records available to practices, for a new patient's first and later consultations. The source of the information shared in all of the instances above in this way is your electronic GP record. <u>Data Retention Period:</u> All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care		
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<u>NHS Digital- Statutory Data Collection.</u>	GP Data for Planning and Research Programme: GP data has a crucial role to play in research and planning which can improve public health, but it is important for patients and the public that this data is made available for appropriate purposes in a secure and trusted manner. This programme is a planned replacement for the GP Extraction Service (GPES) currently used to collect data for planning and research from general practices in England. It is a legal obligation for the practice to comply with the Data Provision Notice 'DPN' for this programme as a result of a new direction from the secretary of state for health and social care as part of the Health and Care Act 2012. Once fully established, this new collection will replace multiple other data collections from general practices including the GPES in due course. It is important to state that this new GDPR programme is not a new processing of GP data in any way; what it does is to carry out an ongoing processing i.e. extraction of patients' data by NHS Digital for planning and research purposes via a more efficient means. NHS Digital has set out that, whilst general practice will still retain data controllership over patient records within their practice, once data has been extracted from patient records and	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in the exercise of official authority;</u> <u>DPA Section 8 (d) - processing is necessary for the exercise of statutory functions;</u> The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;</u> <u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u> <u>In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u> Related Legislation: <u>Section 251 NHS Act 2006</u>	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object or opt-out: You have the right to raise an objection or opt-out of having your data shared for the purposes of indirect care (research and planning). You can do so via the <u>national opt-out website</u> Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: <u>https://ico.org.uk/global/contact-us/</u>
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	shared with NHS Digital, NHS Digital will be the responsible and accountable data controller under the UK GDPR for data access and dissemination for planning and research. Full details on the processing of patients' data for this programme can be found in the NHS Digital' privacy notice here: https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research/transparency-notice The national data opt-out applies to the disclosure of confidential patient information for purposes beyond individual care (research and planning) across the health and adult social care system in England. In broad terms the national data opt-out applies unless there is a mandatory legal requirement or an overriding public interest for the data to be shared. The opt-out does not apply when the individual has consented to the sharing of their data or where the data is anonymised. Any person registered on the Personal Demographic Services (PDS) and who consequently has an NHS number allocated to them is able to set a national data opt-out. The opt-out is stored in a central repository against their NHS number on the Spine. The national opt-out applies to a number of datasets including: National Clinical Audit of Rheumatoid and		
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	Early Inflammatory - NHS Digital collects this data on behalf of the British Society for Rheumatology to improve the quality of care for patients with Rheumatoid and early. National Adult Community Acquired Pneumonia (CAP) Audit - NHS Digital collects this data on behalf of the British Thoracic Society to assess variation in the care of patients hospitalised with pneumonia in the UK. Trauma Audit & Research Network (TARN) - NHS Digital collects this Confidential Patient Information on behalf (CPI) on behalf TARN Invoice Backing Data for Contracted Activity - NHS Digital collects this data to enable Commissioners to determine if they are the responsible commissioner. It is important to point out that the national opt-out applies to contracted activity data that has not been rendered anonymous. Risk Stratification data for Indirect Care - NHS Digital collects this data for data processors working on behalf of GPs and CCGs. The GP data is linked to other records that they access, such as hospital attendance records in order to enable the CCGs (commissioners) understand the local population needs and plan for future requirement. The source of the information shared in this		
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	way is your electronic GP record. The source of the information shared in all of the instances above in this way is your electronic GP record. <u>Data Retention Period:</u> All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care		
Open Exeter	Open Exeter is a web-enabled viewer which provides the facility for healthcare professionals to share/access patient data held on the National Health Application and Infrastructure Services (NHAIS) systems, including cervical screening, breast screening, organ donor, blood donor and home oxygen. Access to Open Exeter is only possible on the N3 network, and via authorised logons/passwords provided by NHS Digital. The source of the information shared in this	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise

	way is your electronic GP record. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	an objection to your personal data being shared in Open Exeter. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
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f. Data Processors

System/database	Purpose of the processing and data retention periods	Lawful basis	Your Rights
Recipients or categories of recipients of the personal or special categories of personal data		General Data Protection Regulation - Article 6 - - Article 9 – Data Protection Act - Section 8 - - Section 10 – -Part 1 of Schedule 1 -	

EMIS Clinical Record System	EMIS are responsible for the provision of a clinical system, software and IT services used by the Practice to securely store and process your medical record. All information about your personal health records are stored in your GP electronic record. This information is then available to practice staff & external bodies as outlined in this document. <u>Data Retention Periods:</u> All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care “GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union. Electronic patient records must not be destroyed or deleted for the foreseeable future.”	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane
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Care Plan Management System CPMS	CPMS is responsible for the provision of IT clinical systems that enables safe, digitised patient care across the healthcare facilities. The supplier of CPMS - an Electronic Health Record (EHR) that links system and brings together patient data across the health and care system irrespective of traditional organisational or technological boundaries. This means health and care professionals in Kent and Medway can access subsets of their patients/service users' medical or social records from a single system in order to provide the best possible care. The source of the information shared in this way is your electronic GP record for the purposes of direct patient care and population health management. Data Retention Periods: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care "GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being in CPMS. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire

	Electronic patient records must not be destroyed or deleted for the foreseeable future.”	protection;	Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Docman and Docmail	Docman Limited act as a data processor and provides cloud-based storage software for electronic patient document. This includes letters that we receive, scan and upload to the patient record, as well as letters that we receive in an electronic format. Generally, Docman enables primary health care organisations capture, file, workflow, view and manage primary care documents efficiently. Docmail enables primary health care organisations send letters, invoices and documents directly from computers and other portable devices. The source of the information shared in this way is your electronic GP record for the purposes of direct administrative patient care. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care “GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the

	Electronic patient records must not be destroyed or deleted for the foreseeable future.”		Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
iPlato	iPlato is cloud-based text messaging service used by GPs to communicate with their patients. The source of the information shared in this way is your electronic GP record for the purposes of direct administrative patient care. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care “GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union. Electronic patient records must not be destroyed or deleted for the foreseeable future.”	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment,	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please

		social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Quality Medical Solutions UK (QMS-UK):	QMS-UK are commissioned by NHS England to provide secure data processing solutions for two services: Child Health Information Service – information relating to children's vaccinations is shared with KCH NHS Foundation Trust, Kent & Medway School & Community Immunisation Team who run one of 4 Child Health Information Services across Kent and Medway National Diabetic Retinal Screening Service – Diabetic eye screening is carried out in Kent and Medway by Health Intelligence Data Retention Period: All records held in the Practice EMIS system	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared in QMS. If you wish to exercise any of your rights please

	are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care “GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union.	DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Optum Health Care Consultants Eclipse Health Diagnostics Ltd Apollo Medical Systems	Brewer Street Surgery performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses i.e. Diabetes, heart disease, risk of falling). Your records may be amongst those searched. This is often called “risk stratification” or “case finding”. These searches are sometimes carried out by Data Processors who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessment may then be shared with other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments,	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. If you wish to exercise any of your rights please

	therapies and or care. Risk stratification can be grouped into two purposes namely: Direct Care – ‘Case Finding’ where carried out by a health professional (e.g. GPs and Provider) involved in an individual’s care or by a data processor acting under contract with such a provider, it is treated as direct care. Indirect Care - understand the local population needs and plan for future requirement. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period:</u> All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection; Related Legislation: Section 251 NHS Act 2006	contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
GPRD General Practice Research Data Base THIN The Health Improvement Network NIHR National Institute for Health Research	To enable healthcare professionals working for the Brewer Street Surgery to provide information, derived from GP records, about individuals to accredited research organisations. This covers research situations where the data controller (Brewer Street Surgery) is approached by research organisations, directly, to recruit patients for studies. Any research proposal will only be agreed with a clearly defined protocol, consent	The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.

	mechanisms, and relevant research ethics committee approval, and in line with the principles of Article 89(1) of the EU GDPR. Research organisations do not approach patients directly, rather Brewer Street Surgery will invite appropriate patients directly seeking their wish to take part. This Privacy Notice does not cover situations where Brewer Street Surgery has been approached by an organisation seeking personal data concerning health to be disclosed in the absence of consent, i.e. via Related Legislation: Section 251 NHS Act 2006 / Health Research Authority (HRA) approval. The source of the information shared in this way is your electronic GP record. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: Article 9 (2) (i) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law In accordance with DPA Schedule 1, Part 1, (4) - The condition for the processing is met where it is necessary for archiving purposes, scientific or historical research purposes or statistical purposes; carried out in accordance with Article 89(1) of the GDPR and DPA Section 19, and the processing is in the public interest. Related Legislation: Section 251 NHS Act 2006	Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Shred It co. uk	To provides solutions for records management, data backup and recovery, document management, secure storage, and accredited data destruction. The source of the information shared in this way is your electronic GP record.	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or,

	Data Retention Period: All records held in the Practice Vision system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	personal data concerning health is permitted under the following GDPR and DPA conditions: Article 9 (2) (i) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law In accordance with DPA Schedule 1, Part 1, (4) - The condition for the processing is met where it is necessary for archiving purposes, scientific or historical research purposes or statistical purposes; carried out in accordance with Article 89(1) of the GDPR and DPA Section 19, and the processing is in the public interest.	✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Percy Gore co.uk	The Percy Gore offer a wide range of business assurance services, from internal audit, counter fraud and forensic investigations, risk management and governance. Data Retention Period: All records held in the Practice Vision system are kept for the duration specified in the Records Management Codes of Practice for	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions;	You have the right to: • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for

	Health and Social Care		the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Brewer Street Surgery process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
IRIS Payroll Services	IRIS payroll provides practices with a software solution to enable the recording of Human Resources related information of its employees' personal data, in particular for the purposes of the recruitment, obligations performance contract of employment, rights and benefits management planning, health and safety, equality and diversity in the workplace, health and safety at work. The Practice ensures that personal data it	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of	Employees have the right to: • To access, view or request copies of their personal information held by the Practice; • request rectification of any inaccuracy to their personal information; • restrict the processing of their personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.

	collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England). Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	personal data concerning health is permitted under the following GDPR and DPA conditions: Article 9(2) (b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law; In accordance with DPA Schedule 1, Part 1, (1a) - the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	Right to object: Employees have a general right to raise an objection to the sharing personal data. If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered. Right to complain: If an employee is dissatisfied with the way Brewer Street Surgery process his/her personal data, they have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Anima	Anima is used within the Kent and Medway health and care system, particularly for online patient requests. Anima is a platform for patient engagement, allowing users to submit requests and access information. 2. Data Collection: Identity Data (name, date of birth, etc.) Contact Data (address, email, phone number)	Continuum Health Limited, trading as Anima Health is the data controller and is responsible for the personal data that we collect from you directly (referred to as "Anima Health", "we", "us" or "our" in this privacy policy). 1. The types of personal data we collect about you Personal data means any information about an individual from which that person can be	Your legal rights You have a number of rights under data protection laws in relation to your personal data. You have the right to: Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

	Health information provided through Anima forms Anima collects data through online forms, which may resemble those used during clinical appointments. Data Processing: Anima processes data to facilitate patient requests and access to care. data may be shared with other relevant health and social care organizations within Kent and Medway. 4 6. Data Sharing: - Specify with whom data is shared (e.g., healthcare providers, Graphnet for the Kent and Medway Care Record). - Explain the purpose of data sharing and the safeguards in place. - If applicable, mention the national data opt-out policy and how users can opt-out of secondary uses of their data. 7. User Rights: - Explain the user's rights regarding their data, such as: - The right to access their data - The right to rectify inaccuracies - The right to erasure (in certain circumstances)	identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows: Identity Data includes first name, last name, username or similar identifier, title and date of birth. Contact Data includes address and email address. Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website. Usage Data includes information about how you interact with and use our website and services. We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with services that we provide to help improve the website and our service offering. 2. How is your personal data	- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. - Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. - Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object. - Request the transfer of your personal data
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	○ The right to restrict processing ○ The right to object to processing • Provide information on how users can exercise these rights. 8. Contact Information: • Include contact details for the data controller (e.g., NHS Kent and Medway ICB). • Provide a point of contact for data protection queries. • Include the Information Commissioner's Office (ICO) as a contact for complaints. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care urpose/Use: To use data analytics to improve our services Type of data: (a) Technical, (b) Usage Legal basis: Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business) 4. Disclosures of your personal data We may share your personal data where	collected? We use different methods to collect data from and about you including through: • Your interactions with us. You may give us your personal data by creating an account on our website, filling in online forms or by corresponding with us directly. • Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. 3. How we use your personal data Legal basis The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases: • Performance of a contract with you: Where we need to perform a contract. • Legitimate interests: We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and	to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. • Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios: ○ If you want us to establish the data's accuracy; ○ Where our use of the data is unlawful but you do not want us to erase it; ○ Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or ○ You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. If you wish to exercise any of the rights set out above, please contact us at support@animahealth.com. 9. Contact details If you have any questions about this privacy policy or about the use of your personal data or you want
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	necessary with third party service providers that help us to operate our business, such as Hubspot, Crisp and Userflow. We do not share patient data with these third party service providers. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. 5. International transfers We do not transfer your personal data outside the UK but, if we need to do so in the future, we will ensure that a similar degree of protection is afforded to it by ensuring that the appropriate legal safeguards are implemented. 6. Data security We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a	balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). • Legal obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis. Purposes for which we will use your personal data We have set out below a description of all the ways we will process your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Purpose/Use: To register you as a new customer Type of data: (a) Identity, (b) Contact Legal basis: Performance of a contract Purpose/Use: To link your profile to your organisation (if you are accessing our services on behalf of a Healthcare Provider)	to exercise your privacy rights, please contact us at support@animahealth.com. 10. Complaints You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.
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	breach where we are legally required to do so. 7. Data retention How long will you use my personal data for? We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.	or NHS Digital (if you are accessing our services as a patient) Type of data: (a) Identity, (b) Contact Legal basis: Performance of a contract Purpose/Use: To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy, (b) Dealing with your requests, complaints and queries Type of data: (a) Identity, (b) Contact Legal basis: (a) Performance of a contract, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you) Purpose/Use: To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) Type of data: (a) Identity, (b) Contact, (c) Technical, (d) Usage Legal basis: Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)	
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MedLink Solutions Ltd	Purpose of processing: MedLink provides secure online questionnaires and digital review tools that allow patients to submit health information and self-book appointments as part of long-term condition management and recall. Data gathered from patients by MedLink is sent securely to the practice. Lawful basis: Processing is carried out under UK GDPR Article 6(1)(e) — performance of a task carried out in the public interest — and Article 9(2)(h) — processing necessary for the provision and management of health care systems and services. Data retention: MedLink retains patient-identifiable data only for as long as necessary to deliver the service, maximum 60 days after patient submission. Following this period, all personal data are either anonymised or permanently deleted in accordance with the Data Processing Agreement between MedLink Solutions Ltd and the practice. Data processor: MedLink Solutions Ltd (company no. 11897002) acts solely as a Data Processor for patient data on behalf of the practice, which remains the Data Controller. MedLink UK processes patient data to support	Medilink Solutions Ltd (Digital Health Provider) Medilink Solutions, a provider of online medical tools for GPs and other healthcare providers, has different lawful bases depending on its role as a data processor or data controller. As a data controller: When processing customer data for its own purposes, such as billing or website improvements, it relies on its legitimate interests or the performance of a contract. As a data processor: When processing patient data on behalf of a healthcare provider (the data controller), it acts under the strict instructions of that provider. The provider is responsible for establishing the lawful basis for processing, which for patient health data often falls under specific UK GDPR clauses, such as those related to providing health care or managing health care systems.	Your rights You have the following rights in relation to your Data: Right to access – the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is “manifestly unfounded or excessive.” Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why. Right to correct – the right to have your Data rectified if it is inaccurate or incomplete. Right to erase – the right to request that we delete or remove your Data from our systems. Right to restrict our use of your Data – the right to “block” us from using your Data or limit the way in which we can use it. Right to data portability – the right to request that we move, copy or transfer your Data. Right to object – the right to object to our use of your Data including where we use it for our legitimate interests. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us
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healthcare organizations by sending and processing chronic disease questionnaires, enabling GP practices to communicate with patients, and allowing patients to self-book appointments. MedLink retains patient data for 30 days before anonymizing it, but this policy does not apply to other organizations using the Medilink name.

Purpose of data processing

According to the MedLink Solutions service definition, the company acts as a data processor for GP practices, healthcare providers, and NHS central services. This means it processes patient data on behalf of these organizations for specific purposes, including:

Managing chronic diseases: The service provides digital questionnaires to collect patient data for chronic conditions, which helps release administrative capacity for GP practices.

Improving patient-clinician communication: The platform enables practice staff to send emails and SMS messages to patients.

Enabling self-booking: MedLink facilitates patient self-booking for appointments.

Integrating with health records: Clinical codes derived from patient data are automatically added to the patient's Electronic Health

via this e-mail address: privacy@medlink.co.uk.

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites

This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

MedLink Solutions Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of MedLink Solutions Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for

Record.

Internal record keeping: MedLink uses data for internal purposes and to improve website content and navigation. Data retention periods
MedLink has a specific and limited data retention policy for the patient data it processes on behalf of healthcare organizations:

Patient data: Patient-identifiable data is retained by MedLink for 30 days following submission. It is then anonymized or made unavailable to MedLink.

Backup purposes: The 30-day retention is primarily for backup, allowing data to be resent to the GP practice in case of a data loss event at the practice.

Service exit: If a healthcare organization unsubscribes, no patient data is available from MedLink after one month.

Website data: For its own website, MedLink retains data only for as long as necessary for its stated purpose or until a user requests its deletion. However, some data may persist on

which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

General

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to this privacy policy

MedLink Solutions Ltd reserves the right to change

	backup media for legal or regulatory reasons.			this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations. You may contact MedLink Solutions Ltd by email at privacy@medlink.co.uk .
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9. What is EMIS Systems or Vision System Local Record Sharing?

Your GP medical record is held on our secure clinical system called Vision 360. This clinical system allows for local record sharing with other healthcare providers who are commissioned in your area to provide care (e.g. acute hospitals, mental and community health). Through this record sharing, clinicians are able to see clinical information entered by other organisations who are party to the Vision 360 local record sharing agreement.

This local sharing is used to provide direct patient care for services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across West Kent in line the local Care delivery strategy and the NHS STP.

It also enables specific GPs identify their patients with highly complex, multiple morbidity and/or frailty, who might benefit from targeted multi-disciplinary team support as part of case management and care planning (the "Case Finding Purpose").

How will my information be made available?

The information is accessed in real time and on-demand, meaning that data from your GP record is neither extracted, nor uploaded, nor sent anywhere. The data remains within your GP EMIS database and users are allowed read-view access only. If you have any concerns regarding EMIS local record sharing you can opt out by speaking to your GP Surgery.

10. What do we use anonymised data for?

We use anonymised data to plan health care services. Specifically we use it to:

- check the quality and efficiency of the health services we provide;
- prepare performance reports on the services we provide and,
- review the healthcare we provide in order they are of the highest standard.

11. Details of data linkage with other datasets

Data may be de-identified and linked so that it can be used to improve health care and development and monitor NHS performance. Where data is used for these statistical purposes, stringent measures are taken to ensure individual patients cannot be identified.

When analysing current health services and proposals for developing future services it is sometimes necessary to link separate individual datasets to be able to produce a comprehensive evaluation. This may involve linking primary care GP data with other data such as secondary uses service (SUS) data (inpatient, outpatient and A&E). In some cases there may also be a need to link local datasets which could include a range of acute-based services such as radiology, physiotherapy, audiology etc, as well as mental health and community-based services such as Improving Access to Psychological Therapies (IAPT), community nursing, podiatry etc. When carrying out this analysis, the linkage of these datasets is always done using a unique identifier that does not reveal a person's identity.

The organisation responsible for processing de-identified and linked data under this category, on behalf of the Practice is NHS West Kent CCG. We ensure that the data processor is legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

12. What safeguards are in place to ensure data that identifies me is secure?

We only use information that may identify you in accordance with the GDPR 2016 and DPA 2018. These legislations require us to process your data only if there is a lawful basis for doing so and that any processing must be fair, lawful and transparent.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, protect personal and confidential information held on equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it).

Our appropriate technical and security measures include:

- The ability to ensure ongoing confidentiality, integrity, availability and resilience of our systems;

- the ability to quickly restore availability and access to personal information in the event of a physical or technical incident; and
- a process regularly testing, assessing and evaluating the effectiveness of security measures, and ensure they comply with the concept of privacy by design and default.

The NHS Digital Code of Practice on Confidential Information applies to all of our staff, and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. Brewer Street Surgery staff are trained to ensure information is kept confidential.

We are registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. A copy of the registration is available through the [ICO website](#). You can search by Brewer Street Surgery name or ICO Data Protection Register number Z4857842.

13. What are your rights?

Where information from which you can be identified is held, you have the:

- Right of access to view or request copies of the records
- Right to rectification of inaccurate personal data or special categories of personal data
- Right to restriction of the processing of your data where accuracy of the data is contested, processing is unlawful or where we no longer need the data for the purposes of the processing
- Right to object to any automated individual decision-making
- Right to data portability by requesting the data which you provided to us (not data generated by us) in a structured, commonly used machine readable format. Your right to portability applies only where:
 - data is processed by automated means, and
 - you provided consent to the processing or,
 - the processing is necessary for the fulfilment of a contract

These rights will only apply where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.

Your right to erasure (right to be forgotten) will only apply where you had given 'consent' to process your personal health data and later withdrew the consent, **and does not apply to the extent** where the processing of your personal health data is necessary for:

- [Compliance with a legal obligation which we are subject to, under the UK law or, for the performance of a task carried out in the public interest or, in the exercise of official authority vested on us;](#)
- [medical purposes and/or for reasons of public interest in the area of public health;](#)
[archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;](#)
[the establishment, exercise or defence of legal claims](#)

You can exercise your rights at any time by contacting the Practice (data controller) or the Data Protection Officer (DPO) at the address below, although we will first need to explain how this may affect the care you receive and any overriding legitimate grounds for the processing that may apply.

14. Gaining access to the data we hold about you

You have the right to see or have a copy of personal data we hold that can identify you. You do not need to give a reason to see your data. However, some information may be withheld under some exceptional circumstances.



SARs Subject Access
Request Patient requ send

If you want to access your personal information you must do so in writing by **completing our** Subject Access Request (SAR) form it to:

The Practice Manager
Brewer Street Surgery
4 Brewer Street
Maidstone ME14 1RU

15. What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector.

g. What sort of information can I request?

In theory, you can request any information that the Practice holds that does not fall under an exemption under the FOI Act. You may not ask for information that is covered by the Data Protection Act or EU General Data Protection Regulation (GDPR) under FOIA. However, you can request this under a Subject Access Request – see section above ‘Gaining access to the data we hold about you’.

h. How do I make a request for information?

Your request must be in writing and can be either posted or emailed to:

Email: brewer.street@nhs.net

Post: Brewer Street Surgery
4 Brewer Street
Maidstone ME14 1RU

16. Glossary of Terms

Common Law of Duty of Confidentiality - is not written out in one document like the GDPR or an Act of Parliament. Common Law is also referred to as 'judge-made' or case law. In practice, this means that all patient/client information, whether held on paper, computer, visually or audio recorded, or held in the memory of the professional, must not normally be disclosed without the consent of the patient/client. However, where the disclosure/sharing of the patient/client information is for the purpose of Direct Care consent to such disclosure/sharing may be implied where it is informed, given there is a legitimate relationship between the patient/client and the health professional.

Personal Data - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Categories of Personal Data – data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.