

## PRIVACY NOTICE

### Introduction

Please take the time to read this Privacy Policy as it is important for you to understand how we collect and use your data when you use the Improving Health Limited (IHL) services. This policy explains how we collect, use and store the personal data you provide to us. 'Personal data' is data that relates to you and that identifies or can be used to identify you – this might be your name, email address, or other digital identifiers relating to you, such as cookies, IP addresses or logs.

This privacy notice may change from time to time and, if it does, the up-to-date version will always be available on the IHL website. Please make sure that you are aware of the latest version of this Privacy Policy.

We are proud to give you access to IHL and, in return, we may collect, use and share your personal information as is necessary for us to continue to provide a useful website available in accordance with the Terms and Conditions and to give you the best user experience. We will only use personal information for our purposes in a manner permitted by data protection legislation

IHL understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and employees and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. **Information About Us**

Improving Health Limited a company registered in England and Wales.

Registered Company number: **8926168**

**Address: Cambridge House 1 Addington Square, London SE5 0HF**

**Data Protection Officer Contact Details: [ihl.DPO@nhs.net](mailto:ihl.DPO@nhs.net)**

We are regulated by Care Quality Commission (CQC)

Improving Health Limited (IHL) is a GP federation uniting all GP practices in south Southwark. We are led by a board which is made up of local clinicians and supported by an operational team. We provide NHS primary healthcare services to the Southwark population.

#### 2. **What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. **What is Personal Data?**

3.1 Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier'.

- 3.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.
- 3.3 The personal data that we use is set out in Section 5, below.

#### 4. **What Are My Rights?**

- 4.1 Under the GDPR, you have the following rights, which we will always work to uphold:
- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Section 13.
  - b) The right to access the personal data we hold about you. Section 12 will tell you how to do this.
  - c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Section 13 to find out more.
  - d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Section 13 to find out more.
  - e) The right to restrict (i.e. prevent) the processing of your personal data.
  - f) The right to object to us using your personal data for a particular purpose or purposes.
  - g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
  - h) Rights relating to automated decision-making and profiling - we do not use your personal data in this way.
  - i) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Section 13.
- 4.2 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- 4.3 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

#### 5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us:

- Your name, age/date of birth and gender;
- Your contact details: postal address, telephone numbers (including mobile number)

and e-mail address;

- Your medical issues that are relevant to the service which we are requested to provide, services enquired about and contracted by you;
- For employees of IHL, only bank account details, national insurance number, driving license record, information to enable a DBS check to be carried out. Right to Work and Passport Checks.
- Your communication and marketing preferences;
- Your correspondence and communications with IHL; and
- Other publicly available personal data.

This list is not exhaustive, and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you send us an email. Other personal data is collected indirectly, for example from NHS hospitals or third parties who have your consent to pass your details to us, or from publicly available sources.

## 6. **How Do You Use My Personal Data?**

6.1 Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Supplying our products and (healthcare) services to you. Your personal details are required in order for us to provide you with healthcare services or enter into a contract with you.
- Modifying or improving our services;
- Communicating with you in connection with your customer experience for example, to gauge your level of satisfaction with our service or contact you in connection with any issues or faults;
- Marketing our products or services as set out in the Marketing section below.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us to let us know that you do not wish to receive any information from us).

6.2 With your permission and/or where permitted by law, we may use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

- 6.3 The normal legal basis for processing your data is that it is necessary for the legitimate interests of IHL, including:
- Selling and supplying services to our patients/service users/customers;
  - Protecting our patients/customers/service users, employees and other individuals and maintaining their safety, health and welfare;
  - Promoting, marketing and advertising our services;
  - Improving existing services and developing new services;
  - Complying with our legal and regulatory obligations;
  - Preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
  - Handling patient/customer contacts, queries, complaints or disputes;
  - Protecting IHL, its employees and Patients, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to IHL;
  - Effectively handling any legal claims or regulatory enforcement actions taken against IHL; and
  - Fulfilling our duties to our customers, employees, shareholders and other stakeholders.

7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. All our records are retained in line with the NHS Code of Practice on Records Management.

8. **How and Where Do You Store or Transfer My Personal Data?**

8.1 We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

8.2 IHL is a company whose registered office is in the United Kingdom and we will use your Personal Data within the United Kingdom even if that is not the country of data origin in respect of your Personal Data.

9. **Do You Share My Personal Data?**

9.1 We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

9.2 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority including enforcement agencies (including without limitation the Police) for the purposes of the prevention or detection of crime;

9.3 If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under

the law, as described above in Section 8.

- 9.4 We may share your identity and contact details to any third party who is claiming that any material posted or uploaded by you to our website constitutes a violation of their intellectual property rights or of their right to privacy;
- 9.5 We may disclose your personal data to third parties not listed above where you have given your explicit consent for us to do so, for example where you have opted in;

10. **We will not transfer your Personal Data to any new data controller except:**

- 10.1 where we wish to sell, transfer or otherwise assign the whole or any part of our business or services as directed by commissioners;
- 10.2 where we wish to subcontract, sell or transfer our service provision to a third party;
- 10.3 whereas part of your registration process you have indicated that we may do so for marketing purposes, and you have not withdrawn that consent;
- 10.4 in circumstances where we are required or permitted to do so by law.

11. **Marketing**

- 11.1 Under Data Protection Legislation 2018 you have the right to stop us using your Personal Data for marketing purposes. If you want us to stop using your Personal Data for those purposes, please contact us at [ihl.DPO@nhs.net](mailto:ihl.DPO@nhs.net).
- 11.2 If you have opted in, we may use your Personal Data to keep you informed of our products, services, promotions and events. We may contact you by email to do this. If you want us to stop using your Personal Data for this purpose, please contact us at
- 11.3 If you have opted in, we may use your Personal Data to inform you of third-party products, services, promotions and events which may be of interest to you. For a list of third parties with whom we operate or if you want us to stop using your Personal Data for this purpose please contact us at [ihl.DPO@nhs.net](mailto:ihl.DPO@nhs.net).

12. **How Can I Access My Personal Data?**

- 12.1 If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.
- 12.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Section 13. [To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.]
- 12.3 There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.
- 12.4 We will respond to your subject access request within 30 days and, in any case, not more than] one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

13. **How Do I Contact You?**

13.1 To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

**Address: Improving Health  
Cambridge House  
1 Addington Square  
London SE5 0HF**

**Email : [ihl.DPO@nhs.net](mailto:ihl.DPO@nhs.net)**

**Phone: 0207 358 7000**

14. **Changes to this Privacy Notice**

14.1 We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.