

PRIVACY STATEMENT

September 2020



1 Background:

1.1 Allied Health Professional Suffolk 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 everyone who visits these websites:

- www.ahpsuffolk.co.uk,
- www.physioselfrefer.co.uk
- www.podiatryselfrefer.co.uk

1.2 ("Our Sites") 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.

1.3 Please read this Privacy Statement carefully and ensure that you understand it.

2 Definitions and Interpretation

In this Statement the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Sites when you visit certain parts of Our websites
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

3 Information About Us

3.1 The Company's website(s) is owned by AHP Suffolk, hosted by Astute Technical Solutions and supported by NEL. Registered in England.

3.2 Allied Health Professionals Suffolk, a limited company registered in England and Wales under company number 7542222, whose registered address is: The Lodge, Hartismere Hospital, Castleton Way, Eye, Suffolk IP23 7BH.

3.3 Our VAT number is 175110141.

3.4 The Company's Data Protection Officer is Dwayne Johnson-Clarke, and can be contacted by email privacy@ahps.org.uk or by post at Cedars Black Barn, Cedars Courtyard, Brockford, Stowmarket, Suffolk, IP14 5PQ.

4 What Does This Statement Cover?

4.1 This Privacy Statement applies only to your use of Our Site. Our Site may contain links to other websites.

4.2 Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

5 What Is Personal Data?

- 5.1 Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.
- 5.2 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.

6 What Are My Rights?

- 6.1 Under the Data Protection Legislation, 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 Statement 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 Part 13.
 - b) The right to access the personal data we hold about you. Part 13 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 Part 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 hold. Please contact us using the details in Part 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 withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
 - h) 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.
 - i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- 6.2 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 Part 13.
- 6.3 It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

- 6.4 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- 6.5 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. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 13.

7 What Data Do You Collect and How?

- 7.1 Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please refer to our Cookies Policy on our website. We do not collect any 'special category' or 'sensitive' personal data.

Data Collected	How We Collect the Data
Identity Information including (but not exclusively) name, date of birth, sex, occupation and status	User entered form
Contact information including (but not exclusively) email address, telephone numbers, postal address, GP details	User entered form
Medical information relevant to your care	User entered form
Profile information including (but not exclusively) email address, password, security questions and answers	User entered form
Technical information including (but not exclusively) IP address, browser details, device details and operating system details	Cookies

8 How Do You Use My Personal Data?

- 8.1 Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on Our Site	Identity, contact and profile data	Consent
Providing and managing your Account	Identity, contact and profile data	Consent
Providing and managing your access to Our Site	Identity, contact and profile and technical data.	Public task
Administering Our Site	Technical data	Consent
Administering our service / business	Identity, contact and medical data	Consent
Supplying our services to you	Identity, contact and medical data	Consent

Communicating with you	Identity and contact data	Consent
Supplying you with information by email AND/OR SMS message AND/OR post that you have opted-in-to (you may opt-out at any time by amending your profile online)	Identity and contact data.	Consent
NHS Test and Trace Service	Identity and contact data.	Consent

8.2 We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 13.

8.3 In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

9 How Long Will You Keep My Personal Data?

9.1 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. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including (but not exclusively) name, date of birth, sex, occupation and status.	Data stored online at physioselfrefer.co.uk and podiatryselfrefer.co.uk is stored for 12 months following the last login to the account with which it is linked.
Contact information including (but not exclusively) email address, telephone numbers, postal address, GP details.	
Medical information relevant to your care	Data for completed referrals is transferred to the individual's electronic health record in SystemOne, TPP, Leeds, UK. Retention of these records is set by TPP, Leeds, UK.
Profile information including (but not exclusively) email address, password, security questions and answers.	Data stored online at physioselfrefer.co.uk and podiatryselfrefer.co.uk is stored for 12 months following the last login to the account with which it is linked.
Technical information including (but not exclusively) IP address, browser details, device details and operating system details.	

10 How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

11 Do You Share My Personal Data?

- 11.1 We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.
- 11.2 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Statement.
- 11.3 In some 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.
- 11.4 We will share your personal data with other companies in the National Health Service (NHS) to be able to offer the service you require.
- 11.5 If any of your personal data is shared with 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 Part 9.

12 Can I Withhold Information?

- 12.1 You may access certain areas of Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 12.2 You may restrict our use of Cookies. For more information, please refer to our Cookies Policy on our website.

13 How Can I Access My Personal Data?

- 13.1 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".
- 13.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 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.
- 13.3 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.
- 13.4 We will respond to your subject access request within 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.
- 13.5 In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details,

please consult the help menu in your internet browser or the documentation that came with your device.

- 13.6 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.7 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14 How Do I Contact You?

14.1 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 (addressed to the Data Protection Officer):

- Email address: privacy@ahps.org.uk.
- Telephone number: 03330 433 966.
- Postal Address: AHP Suffolk, the Lodge, Hartismere Hospital, Castleton Way, Eye, Suffolk, IP23 7BH

15 Changes to this Privacy Statement

- 15.1 We may change this Privacy Statement 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.
- 15.2 Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Statement on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.