

We take your privacy seriously and we want to provide you with information about your rights, who we share your information with and how we keep it secure.

1. Your Information

- 1.1 We are registered with the Information Commissioner's Office as a Data Controller and our registration number is Z3108099.
- 1.2 This Privacy Notice relates to the use and collection of data for visitors to our websites.
- 1.3 If you submit data via any of our patient referral portals, please refer to our Patient Privacy Policy to understand how we collect and use patient data.

2. Definitions and Interpretation

- 2.1 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;

- 2.2 The data we collect about visitors to our website will be stored on electronic systems and may include Personal Data that you provide us through the routes below:
 - Content of emails sent to centraladmin@nhs.net and ahpsuffolk.enquiries@nhs.net
 - Submitted Feedback Forms (name, details of feedback)
 - Cookies and device information (Technical information including (but not exclusively) IP address, browser details, device details and operating system details)
- 2.3 Our lawful basis for collecting this information is either because you have consented (sending us emails, feedback forms or analytical cookies) or for our 'legitimate interests' collection of functional cookies and device information.
- 2.4 If you have any questions or wish to make a request in relation to your information, please contact us using the details on our main page or contact our Data Protection Officer at emma.cooper35@nhs.net
- 2.5 Our Data Protection Officer service is provided by Kafico Ltd. When we ask for their support, we will aim to remove any reference to individual patients. Where this is not possible, we will use the minimum necessary to allow us to obtain advice and support.
- 2.6 You can find out more about Kafico Ltd, including their privacy policy at <https://www.kafico.co.uk/privacy-policy>

3. Information Rights

Data protection law provides you with a number of rights that we are committed to supporting you with.

3.1 Right to Access

- a) You have the right to obtain:
 - Confirmation that your information is being used, stored or shared by us
 - A copy of information held about you

- b) We will respond to your request within one month of receipt or will tell you when it might take longer.
- c) We are required to validate your identity including the identity of someone making a request on your behalf

3.2 Right to Object or Withdraw Consent

- a) We mainly use, store and share your information because we are permitted in order to deliver our website but you do have a right to object to us doing this.
- b) Where we are using, storing and sharing your information based on explicit consent you have provided, you have a right to withdraw that consent at any time.
- c) Our Data Protection Officer will be happy to speak with you about any concerns you have.

3.3 Right to Correction

- a) If information about you is incorrect, you are entitled to request that we correct it
- b) There may be occasions, where we are required by law to maintain the original information – our Data Protection Officer will talk to you about this and you may request that the information is not used during this time
- c) We will respond to your request within one month of receipt or will tell you when it might take longer.

3.4 Right to Complain

- a) You also have the right to make complaints and request investigations into the way your information is used. Please contact our Data Protection Officer or visit the link below for more information.
- b) For more detailed information on your rights visit <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

4. Who Do We Share Your Information With?

- 4.1 We use a number of providers who process your personal data on our behalf, and they are all contractually bound to keep your information secure and use it only in the way we tell them.

Website Provider	Website
InfoTex	https://www.infotex.uk/

Email Provider	Website
NHS Mail	https://portal.nhs.net/
Website Hosting Provider	Website
Astute	http://www.astutedata.co.uk/contact-us.html
Website Analytics	Website
Google	https://analytics.withgoogle.com/
Microsoft Application Insights	Website
Azure Monitor	https://azure.microsoft.com/en-us/services/monitor/

5. Sharing When Required by Law

Sometimes we will be required by law to share your information and will not always be able to discuss this with you directly. Examples might be for the purposes of detection or prevention of crime, where it is in the wider public interest, to safeguard children or vulnerable adults, reporting infectious diseases or where required by court order.

6. Keeping Your Information Safe

6.1 We are committed to ensuring the security and confidentiality of your information.

6.2 There are a number of ways we do this;

- Staff receive annual training about protecting and using personal data.
- Policies are in place for staff to follow and are regularly reviewed.
- We check that only the minimum amount of data is shared or accessed.
- We use restricted access to systems, this helps to ensure that the right people are accessing data – people with a 'need to know'
- We use encrypted emails and storage which would make it difficult for someone to 'intercept' your information.
- We report and manage incidents to make sure we learn from them and improve.
- We put in place contracts that require providers and suppliers to protect your data as well.
- We do not send your data outside of the United Kingdom unless there are appropriate and lawful safeguards in place

7. How Long Do We Keep Your Information?

- Website enquiry (non-patient) – dependant on nature of enquiry but no longer than necessary
- Google Analytics Data – 26 months
- Feedback responses – 12 months

Document Control

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Author:	Joseph Russell
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AGREED POLICY REVIEW / RATIFICATION / ADOPTION PATH:

<p>Level 1:</p> <p>Executive Team</p> <p>Date Agreed: 10 December 2021</p>	<p>Level 2:</p> <p>Quality & Safety Committee</p> <p>Date Agreed: 7 December 2021</p>
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