



*Golders Hill Health Centre*

# Golders Hill Privacy Notice

This Privacy Notice provides details of the personal data we collect from you, what we do with it, how you might access it and who it might be shared with.

## Controller

Independent Doctors Federation is the controller and responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice)

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager, [jenny@goldershillsurgery.com](mailto:jenny@goldershillsurgery.com).

## What personal data do we collect and how do we collect it?

The personal data we collect depends on whether you just visit our website or use our services. If you visit our website, you do not need to provide us with any personal data. However, your browser transmits some data automatically, such as the date and time of retrieval of one of our web pages, your browser type and settings, your operating system, the last web page you visited, the data transmitted and the access status, and your IP address.

If you use our services personal data is collected by filling in forms or by corresponding with us by post, phone, email or otherwise.

We may collect, use, store and transfer:

- Banking Details
- Confidential Correspondence
- Email, Social Networks
- Location Information
- Name
- Photographs together with Identifiers
- Telephone contact details
- Digital Images
- Education History
- Employment History
- Family
- General Medical Council number
- Revalidation data and documentation
- Online Identifiers

We may collect special categories of personal data being racial or ethnic origin.



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## **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use 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. We also set out the periods for which we retain the data.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.



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<b>Processing purpose</b>	<b>Legal basis</b>
Service delivery	Performances of a contract with you
Communications, marketing and intelligence	(a) Necessary for our legitimate interests (Communications, marketing and intelligence)  (b) Performance of a contract with you
Archiving	Necessary for our legitimate interests (Legal and regulatory compliance)
Customer Support	Performance of a contract with you
Identity verification	Necessary to comply with a legal obligation
Legal and regulatory compliance	Necessary to comply with a legal obligation
Organisation's administration and management	Necessary for our legitimate interests (Business operations and due diligence)
Payment Card processing	(a) Necessary for our legitimate interests (to recover debts due to us).  (b) Performance of a contract with you.
Personalisation and customisation of the online experience	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 and to inform our marketing strategy).
Product development and enhancement	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).



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Sales and distribution of products and services	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
Service delivery	Performance of a contract with you
Travel and events management	Performance of a contract with you
Industry specific regulation, we have to comply with a legal obligation standards and intelligence	Necessary to comply with a legal obligation
Appraisal and revalidation of doctors	(a) Necessary to comply with a legal obligation (b) Performance of a contract with you

## Who might we share your personal data with?

We may have to share your personal data with the parties set out below for the purposes set out in the Glossary below as well as to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

## International transfers

We do not transfer your personal data outside the European Economic Area (EEA).



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## **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 breach where we are legally required to do so.

## **Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

## **Your legal rights**

You have a number of rights in relation to your personal data. These are:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.



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These are more fully set out in the Glossary below.

If you wish to raise a complaint on how we have handled your personal information, you can contact our data privacy manager who will investigate the matter. We hope that we can address any concerns you may have, but you can always contact the Information Commissioner's Office (ICO). For more information, visit [ico.org.uk](http://ico.org.uk).

## Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES

- Service providers acting as processors based in the EU who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the EU who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, General Medical Council, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.



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## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data 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.

**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. 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) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



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**Request the transfer** of your personal data 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.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.