Chadwell Heath Surgery

Privacy Policy

V 1.0 Last Updated and approved by Bushra Ali on 07/03/2020.

Chadwell Heath Surgery is a GP Practice located at 72-74, Chadwell heath lane, Romford, RM6 4AF.

This Policy describes howChadwell Heath Surgery (“CHS”, “Company”, “we”, and “our”) collect, use and share personal data.We encourage you to read the Privacy Policy on our website in full.

However, to summarise:

* We will always use your data within the law
* We will never sell your data; and
* We will always respect your wishes about how you would like to be contacted.

We are committed to protecting and respecting your privacy.

This Policy explains when and why we may collect personal information about people who visit our website, our premises our use of emails, and any other methods we use forcollecting information; how we use it, the conditions under which we may disclose it to others and how we keep it secure.

This Policy only applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.

We may update this privacy policy from time to time by publishing the amended version on our website.

Summary

*This is just a summary. Please ensure you read the full, legal version*[*below*](https://www.twilio.com/legal/privacy/website#full_version)*.*

* This privacy notice relates to our publicly-accessible website, our premises and supporting business services such as email.
* We collect data that you give us, when you complete web forms on our website and we use that data for the reasons you gave it to us. We also use cookies to collect data automatically about your use of our website or for advertising. For details on how to manage your preferences for cookies and tracking technologies, please go to our **Cookie** [**Notice**](file:///S:\CQC\Data%20Protection,%20IG,%20GDPR%20Policies\1.%20Privacy%20Notices\CHS%20Cookie%20Policy.docx)**.**
* We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.
* We generally share the data we collect from you with those outside of CHSif they are a service provider for CHS(and must follow our instructions) or if we’re legally required to share it with someone outside of CHS.
* Your data is not transferred outside of the European Union.
* If you want to ask how to delete or access your data, email [chadwellheath.surgery@nhs.net](mailto:chadwellheath.surgery@nhs.net).

Full Version

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Introduction

Below is a description of what data we gather from you as a visitor to our publicly-accessible website. Also, included below is a description of why we collect and how we use the data we collect on the Site.

In this notice, the words “our,” “us,” “we,” and “CHS” refer to Chadwell Heath Surgeryand our affiliates (which includes any person or entity that controls us, is controlled by us, or is under common control with us, such as our subsidiary, parent company, or our employees).

Before you submit any information on or through the CHSwebsite, please carefully review this notice. By using any part of the CHSSite, you consent to the collection, use, disclosure and sharing of your information as further outlined below in this notice.

What data we collect, how we collect it and why

**Data you give to us directly.** On some places on the CHSSite, you can fill in a web form to share your data with us directly. We collect the information you provide in response to those web forms. Occasionally, we may also offer opportunities for you to share your data with us such as through a survey, to sign up for a newsletter, or to register for or receive details about an event we are sponsoring. If you participate in those surveys, sign up for a newsletter, or register for an event, we will collect the information you provide to us in doing so.

**Data we collect from you automatically.** When you visit the CHSSite, we and our service providers acting on our behalf automatically collect certain data using tracking technologies like cookies, web beacons, and similar technologies. Want more details on our use of cookies and tracking technologies? Click **here**.

**People who email us**  
We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

What we use your data for

**Data you give us directly.** For data that you give to us directly through a“Contact Us” page, we will use that data to formulate a response to your inquiry and know how to get back to you with our response. Similarly, if you provide us information directly in response to a survey or when signing up for an event, we will use the data you provide for the reason that you provided it to us and for other purposes that we tell you about at the time when you provided that data.

If you purchase a product from us, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions,

**Data we collect automatically.** For data that we collect from you automatically through tracking technologies, we use this data to understand how visitors to the CHS Site are using it and which pages and features of the CHS Site are most popular. This helps us understand how we can improve our Site and track performance of our advertisements. In addition, tracking technologies are used to help improve the navigation experience on the CHS Site. For more details on our use of cookies and tracking technologies, click **here**.

How long we retain your data

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. A summary of the retention policy is provided below:

| **Type of Records** | **Retention Period** |
| --- | --- |
| GP Medical records | GP Records are retained for 10 years after death or after the patient has permanently left the country; unless the patient remains in the European Union. In the case of a child, if the illness or death could have potential relevance to adult conditions or have genetic implications for the family of the deceased, the advice of clinicians should be sought as to whether to retain the records for a longer period. Electronic patient records (EPRs) must not be destroyed, or deleted, for the foreseeable future. |
| Recruitment applications and CV’s | Applications, CV’s and details of interviews for all applicants will be retained for 12 months after which the personal identifiable information for unsuccessful applicants will be deleted. |

Who we may share your data with

Unless you give us your permission, we don’t share data we collect from you with third parties, except as described below:

* **Third-party service providers or consultants**. We may share data collected from you on the CHS Site with third-party service providers or consultants who need access to the data to perform their work on CHS’s behalf, such as a website analytics company or our third-party advertising partners. These third-party service providers are limited to only accessing or using this data to provide services to us and must provide reasonable assurances that they will appropriately safeguard the data.
* **Compliance with Laws.** We may disclose your data to a third party if (i) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or government request (including to meet national security or law enforcement requirements), (ii) to enforce our agreements and policies, (iii) to protect the security or integrity of the CHS Siteor our services and products, (iv) to protect ourselves, our other customers, or the public from harm or illegal activities, or (v) to respond to an emergency which we believe in good faith requires us to disclose data to assist in preventing a death or serious bodily injury. If CHSis required by law to disclose any of your data that directly identifies you, then we will use reasonable efforts to provide you with notice of that disclosure requirement, unless we are prohibited from doing so by statute, subpoena or court or administrative order. Further, we object to requests that we do not believe were issued properly.
* **Affiliates.** We may share data collected from you from the CHS Site with our affiliates. We all will only use the data as described in this notice.
* **Business transfers.** If we go through a corporate sale, merger, reorganisation, dissolution or similar event, data we gather from you through our website may be part of the assets transferred or shared in connection with due diligence for any such transaction. Any acquirer or successor of CHSmay continue to use the data we collect from you through our Site as described in this notice.
* **Aggregated or anonymised data.** We might also share data collected from you from theCHSSite with a third party if that data has been anonymised or aggregated in a way that does not directly identify you.

We do not share your data (including, but not limited to, the personal data of your end users) with third parties for their direct marketing purposes, unless you give us your consent to do so.

Information from Children

We do not knowingly collect any personal information directly from children under the age of 16. If we discover we have received any personal information from a child under the age of 16 in violation of this Policy, we will take reasonable steps to delete that information as quickly as possible. If you believe we have any information from or about anyone under the age of 16, please contact us at [chadwellheath.surgery@nhs.net](mailto:Patientservices@healthbridgedirect.co.uk).

How we secure your data

We use appropriate security measures to protect the security of your data both online and offline. These measures vary based on the sensitivity of the information that we collect, process and store and the current state of technology. Please note, though, that no website or internet transmission is completely secure, so while we strive to protect your data, we cannot guarantee that unauthorized access, hacking, data loss or a data breach will never occur.

How we tell you about changes to our privacy practices

We may change our Website Privacy Notice from time to time. If we make changes, we’ll revise the “Last Updated” date at the top of this notice, and we may provide additional notice such as on the CHS Site homepage. If we make any material changes to this notice;we will notify you of those changes through a notice on the CHS Site or through other reasonable means of communication, such as email. We will comply with applicable law with respect to any changes we make to this notice.

How to make choices about your data

**Deletion, access, and changes to your data.**The accuracy of your information is important to us. To request deletion of, access to, or to make changes to data we’ve collected from you via the CHS Site or any other means; email us at[chadwellheath.surgery@nhs.net](mailto:Patientservices@healthbridgedirect.co.uk). Please note that even if you request that we delete data we’ve collected from you, we may still retain data collected from you in an aggregated or anonymized form that does not identify you. We also will not delete your data if we are legally required to maintain it.

**Promotional communications.** If you are receiving promotional emails from us, you can choose to stop receiving those by following the unsubscribe/opt-out instructions in those emails. You can also opt-out by contacting[chadwellheath.surgery@nhs.net](mailto:Patientservices@healthbridgedirect.co.uk).

**Cookies and tracking technologies.** How you make choices about cookies and other tracking technologies depends on the type of cookie or tracking technology being used. For details on how to manage your preferences for cookies and tracking technologies, please go to our [**Cookie Notice**.](file:///S:\CQC\Data%20Protection,%20IG,%20GDPR%20Policies\1.%20Privacy%20Notices\CHS%20Cookie%20Policy.docx)

How you contact us

You may contact **Data Protection Officer**byEmail:

DPO: NICHOLAS MURPHY-O'KANE

EMAIL: nick@nmgconsultancy.co.uk

or, you may write to us at the address listed below.

**Chadwell Heath Surgery**  
72-74, Chadwell Heath Lane, Romford, RM6 4AF

Your rights

You have the right to access the personal data which we hold about you. This is called a Subject Access Request (SAR) and must be made to Data Protectionusing the details above.

You may use this process to exercise your right to:

* Have your personal data rectified if it is inaccurate or incomplete.
* Request that we erase information we hold about you.
* Restrict the processing of your personal data, for example ask us not to contact you.
* Object to the processing of your data for specific purposes such as communications or direct marketing.
* Ask for the transfer of your data electronically to be provided to a third party (data portability)

You also have the right to lodge a complaint with the Information Commissioner’s Office:

Address:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113 (local rate)

Website: https://ico.org.uk/global/contact-us/