

Introduction

This Privacy Notice, also known as a “Fair Processing Notice” explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we’ll store and handle that data and keep it safe.

Personal data is information that relates to a living individual who can be identified from that data.

We want you to be fully informed about your rights, and how Hugh Steeper Ltd uses your data.

Who are we?

Hugh Steeper Limited provide a range of rehabilitation products and services to private and international markets as well as in partnership with the National Health Service in the UK.

Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the best standards to protecting your personal information. If you have any questions about how we use your personal information, our DPO can be reached by email at:

dpo@steepergroup.com

or by post at

Data Protection Officer,
Unit 3 Stourton Link,
Intermezzo Drive,
Leeds
LS10 1DF

Why do we collect information about you?

The team of healthcare professionals caring for you keep records about your health, any treatment and care you receive from us. These records help to ensure that you receive the best possible care. They may be written down in paper records or held on computer.

What types of personal data do we collect / process about you?

- Identity Details - name, date of birth, NHS Number.
- Contact Details – address, telephone numbers, email address.
- Next of Kin – contact details of a close relative or friend.
- Details and Notes of any diagnosis and treatment given.
- Contact we have had with you such as appointments or clinic visits.
- Prescriptions/Orders created to help in your treatment

Certain data is classified under the General Data Protection Regulation as “special categories”. The special categories of personal data concerned are:

- Ethnic Origin
- Religious beliefs
- Health Data

It is essential that your details are accurate and up to date. Always check that your personal details are correct when you visit us and please inform us of any changes as soon as possible.

How your personal information is used?

Your records are used to direct, manage and deliver the care you receive to ensure that:

- The Healthcare professionals have the information they need to be able to assess your health and decide on the most appropriate care and treatment you receive.
- Appropriate information is available if you are referred to a specialist.
- Any complaints or concerns you have can be properly investigated.

We may also review and process your personal data using 3rd party systems, for example NHS systems, Shared Care Records and GP Connect. We will only process your personal data in compliance with any Data Processing Agreements held with those 3rd Party systems and this notice.

Our legal basis for processing your personal and special categories of data?

We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

- We have your consent (if consent is needed).
- We need to use the information to comply with our legal obligations.
- We need to use the information to perform a contract with you.
- It is necessary for the provision of preventive or occupational medicine, medical diagnosis, provision of health or social care treatment, or management of health and social care systems and services, under the basis that appropriate contracts with health professionals and safeguards are in place.

Disclosure

We may need to transfer your information to subcontractors, suppliers, solicitors, insurance companies and regulatory authorities where we need to make products and services available to you, as part of your care, meet or enforce a legal obligation or where it is fair and reasonable for us to do so. We will only share your personal information to the extent needed for those purposes.

We may need to transfer your personal information to territories that are outside the UK. We will only transfer your personal information outside the UK where either

the transfer is to a country which the UK has decided ensures an adequate level of protection for your personal information, or we have put in place our own measures to ensure adequate security as required by data protection law.

Retention period

Hugh Steeper Ltd will process your personal data for the duration of your care or whilst under contract with a data controller to process your data. In some circumstances we will hold personal information for longer where necessary for warranty periods or legal requirements.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Hugh Steeper Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

How do you opt-out of sharing?

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt-out your confidential patient information will still be used to support your individual care.

National Data Opt-out

You can only opt-out via NHS Digital and there are 3 options:

1. Online – via the following link.
<https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/>
You must have an email address or mobile phone number registered with an NHS Service to use this method.

2. Telephone – via 0300 303 5678. The NHS Digital Contact Centre will verify your identity and discuss your data sharing choices. The Contact Centre may be able to guide you through the online service or set a choice on your behalf.
3. Print and post – if you are unable to use the online or telephone service, you can use a paper print and post form to set a choice instead via the following link:
https://assets.nhs.uk/prod/documents/Non-Digital_Opt-Out_Form_v15.pdf

What forms of ID will I need to provide when requesting?

Hugh Steeper Ltd accepts the following forms of ID when information on your personal data is requested:

- Passport.
- Driving licence.
- Birth certificate.
- Utility bill (from last 3 months).

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Hugh Steeper Ltd (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority, for the UK this is the Information Commissioner's Office at <http://ico.org.uk>, and Hugh Steeper Ltd's Data Protection Officer at dpo@steepergroup.com.