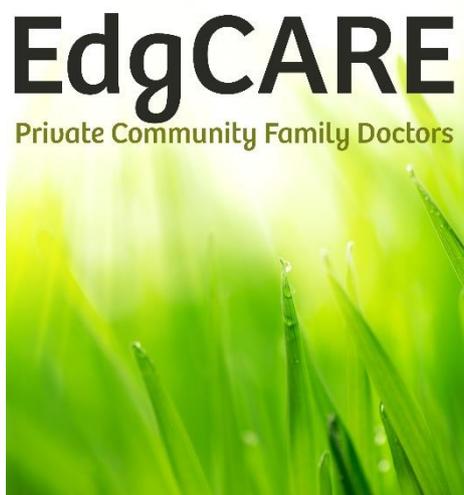


# Privacy Notice

## EdgCARE – Private Community Family Doctors

May 2018



## 1. Introduction

The UK Data Protection Bill will become law when enacted as the Data Protection Act 2018. It will explicitly bring provisions of the EU General Data Protection Regulation (GDPR) 2016 into UK law and establish continuity of the GDPR. The Act will legislate in areas where the GDPR allows flexibility at national level. It will also introduce legislation on processing for law enforcement purposes (in support of the EU Law Enforcement Directive) and by the intelligence services, and make provision for the Information Commissioner (the UK supervisory authority). The current Data Protection Act (DPA) 1998 will be completely repealed when DPA 2018 comes in force.

This Privacy Notice has been written in line with the EU GDPR 2016. The Privacy Notice will be reviewed when the DPA 2018 comes in force in order to align it with the Act.

## 2. What is this Privacy Notice about?

Privacy Notice is the conditions which have to be met for any activity involving personal data or special categories of personal data to be lawful. Being transparent and providing accessible information to individuals about how an organisation will use their personal information is a key element of Data Protection Legislations. The most common way to provide this information is in a Privacy Notice.

This Privacy Notice is part of our programme to make the data processing activities we are carrying out in order to meet our healthcare obligations transparent.

The Privacy Notice tells you about information we collect and hold about you, the legal basis for collecting and holding the information, what we do with it, how we keep it secure (confidential), who we might share it with and what your rights are in relation to your information.

## 3. Who we are

EdgCARE is a Private GP Practice which provides GP consultations, home visits, blood tests, immunisations and other primary care services to people in the North London area.

## 4. Types of information we use

We use the following types of information/data:

- Personal data or sensitive personal/special categories of personal data such as:
  - demographics – name, address, date of birth, postcode, patient ID number, NHS number
  - racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, medical/health data, sexual life or sexual orientation data.
- Pseudonymised - about individuals but with identifying details (such as name or NHS number) replaced with a unique code.
- Anonymised - about individuals but with identifying details removed.
- Aggregated - anonymised information grouped together so that it doesn't identify individuals.

## 5. What we use your personal data and special categories of personal data (known as or sensitive personal) for

We use and share information about you in a number of ways. These include:

**Primary uses** - information from your GP medical record which can be made available to other healthcare organisations, including doctors, nurses and care professionals in order to help them make the best informed decision, and provide you with the best possible direct care delivery.

**Secondary uses** - information from your GP medical record involves extracting identifiable data and (usually) sharing that data with other healthcare organisations, for the purpose of indirect care. Examples include using your information for [research](#), auditing, and healthcare planning (population health management). EdgCARE is not currently engaged in processing your data for secondary uses.

## 6. Identity and Contact details of the Data Controller and Data Protection Officer

Dr Mark Semler  
EdgCARE  
2<sup>nd</sup> Floor  
BMI Hendon Hospital  
46-50 Sunny Gardens Road  
London NW4 1RP  
Tel: 0800 689 0613  
Email: [info@edgcare.net](mailto:info@edgcare.net)

## 7. Organisations we share your your personal information with

We share information about you with other GPs, NHS acute or mental health Trusts, Independent sector (Private Healthcare) hospitals, Consultants (Private sector and NHS), local authority, community health providers, pharmacists, for the purposes of direct and indirect care delivery of care.

We are required under the law to provide you with the following information how we process your personal data, the purpose of proposing, recipient/categories of your personal data, the identity of our Data Protection Officer (DPO), how long we retain personal information about you, the legal basis and justification for the processing, and your right to view, request access copies of your personal information, or object to the processing.

Included below is a table of the organisations we share information about you with split into the following categories. **In all cases, the data controller and Data Protection Officer (DPO) are as listed in section 6 above.**

Direct Medical Care and Administration				
Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Data Retention Period	Lawful basis General Data Protection Regulation - Article 6 - - Article 9 -	Your Rights
<p><b>Private Healthcare Providers, NHS Trusts – Hospitals, Community or Mental Health Trusts.</b></p>	<p>Personal data concerning your GP medical record may be shared with other Private Sector Healthcare Providers and/or NHS Trusts in order to enable their healthcare professionals make the best informed decision about your health needs, and provide you with the best possible care if you visit the hospital for routine care and referrals.</p> <p>Your personal information may also be processed for local administrative purposes such as:</p> <ul style="list-style-type: none"> <li>• Waiting list management;</li> <li>• local clinical audit;</li> <li>• Performance against local targets;</li> <li>• activity monitoring;</li> </ul> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p><a href="#">Article 6(1) (e) - public interest or in the exercise of official authority.</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law.</a></p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p>

			<p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</a></p> <p><b>Related Legislation:</b></p> <p><a href="#">Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);</a></p> <p><a href="#">Common Law of Duty of Confidentiality</a></p>	<p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE processes your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><b>Emergency Services (Ambulance trusts, police, A&amp;E departments, out of hours services, 111)</b></p>	<p>There are circumstances when intervention is necessary in order to save or protect a patient’s life or to prevent them from serious immediate harm, for example, during a collapse or diabetic coma or serious injury or accident. In many of these circumstances the patient may be unconscious or too ill to communicate.</p> <p>Medical professionals have a duty of care to share data in emergencies to protect their patients or other persons. In these circumstances, your GP medical record will be shared with emergency healthcare services, the police or fire service in order to enable you receive the best treatment or service.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p><a href="#">Article 6(1) (d) – the processing is necessary in order to protect the vital interests of the data subject</a></p> <p>The processing of <b>special categories of personal</b></p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• Make pre-determined decisions about the type and extent of care you will receive in an emergency, these are known as “Advance Directives”;</li> <li>• access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul>

	<p>The source of the information shared in this way is your electronic GP record.</p>		<p><b>data concerning health</b> is permitted under the following paragraph:</p> <p><a href="#">Article 9 (2) (C) – the processing is necessary to protect the vital interests of the data subject</a></p> <p><b>Related Legislation:</b></p> <p><a href="#">Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);</a></p> <p><a href="#">Common Law of Duty of Confidentiality</a></p>	<p><b>Right to object:</b> You have the right to object to some or all of your personal information being shared with the recipients. You also have the right to have an “Advance Directive” placed in your records and brought to the attention of relevant healthcare workers or staff.</p> <p>We will notify you at the earliest opportunity where we have shared your personal data in an emergency situation.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE processes your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:          Information Commissioner’s Office          Wycliffe House          Water Lane          Wilmslow          Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745          Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><b>Your NHS GP</b></p>	<p>On occasion we made need to share information from your electronic medical record with your registered NHS GP. This is to enable safe and effective provision of medical care.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice</a></p>	<p>The processing of <b>personal data</b> is permitted under the following paragraphs:</p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where:</li> </ul>

		<p><a href="#">for Health and Social Care</a></p>	<p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p><a href="#">Article 6(1) (e) - public interest or in the exercise of official authority.</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraph:</p> <p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</a></p> <p><b>Related Legislation:</b></p> <p><a href="#">Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);</a></p> <p><a href="#">Common Law of Duty of Confidentiality</a></p>	<ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> <p><b>Right to object:</b> In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE processes your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
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<p><b>Pharmacists</b></p>	<p>It is occasionally necessary to share information with a Pharmacist in order to ensure that you are being prescribed medication safely and in the right doses. This information usually pertains to your medications but may also relate to your medical history.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a></p>	<p>The processing of <b>personal data</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p><a href="#">Article 6(1) (e) - public interest or in the exercise of official authority.</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraph:</p> <p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</a></p> <p><b>Related Legislation:</b></p> <p><a href="#">Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);</a></p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE processes your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow</p>
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				<p>Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745          Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><b>Local Authority – Social Services</b></p>	<p>EdgCARE works together with Local Authorities to support and care for people of all ages to deliver the best possible social care.</p> <p>Personal data concerning your GP medical record may be shared with Local Authorities and Multidisciplinary Team (MDT) delivering social care in order to enable them make the best informed decision about your social care needs if required.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p><a href="#">Article 6(1) (d) (processing for vital interests of data subject) and/or;</a></p> <p><a href="#">Article 6(1) (e) - public interest or in the exercise of official authority.</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law.</a></p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where:             <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:</p>

			<p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</a></p> <p><b>Related Legislation:</b></p> <p><a href="#">Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share)</a></p>	<p>Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><b>Care Homes</b></p>	<p>Personal data concerning your GP medical record may be shared with Care Homes and other Multidisciplinary Team (MDT) delivering care in order to enable their care professionals make the best informed decision about your care needs, and provide you with the best possible care if you visit a Care Home.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a></p>	<p>The processing of <b>personal data</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p><a href="#">Article 6(1) (e) - public interest or in the exercise of official authority.</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 9(2) (b) – processing necessary in the field of employment,</a></p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct</p>

			<p><a href="#">social security and social protection law.</a></p> <p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</a></p> <p><b>Related Legislation:</b></p> <p><a href="#">Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share)</a></p>	<p>provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:  Information Commissioner’s Office  Wycliffe House  Water Lane  Wilmslow  Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745  Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
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## Statutory Disclosures of Information

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Data Retention Period	Lawful basis General Data Protection Regulation - Article 6 - - Article 9 –	Your Rights
<p><b>Safeguarding Concerns</b> – to prevent an individual, or to prevent a serious crime</p>	<p>Some members of public are recognised as needing safeguarding protection, for example children and vulnerable adults. If an individual is identified as being at risk from harm, we have a duty to do what we can to protect that individual, and we are bound ‘Safeguarding’ laws to do so.</p> <p>Where there is a suspected or actual safeguarding issue we will share information that we hold about you with other relevant agencies such as local Ambulance trusts, the police, A&amp;E departments, out of hours services, 111 or Social Services)</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p><a href="#">Article 6(1) (d) – the processing is necessary in order to protect the vital interests of the data subject</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 9 (2) (C) – the processing is necessary to protect</a></p>	<p>This sharing is a legal and professional requirement and therefore there is no right to object.</p> <p><a href="#">The Children Act 1989</a> requires local authorities to investigate where a child is the subject of an emergency protection order, is in police protection or where there is a reasonable cause to suspect that a child is suffering or is likely to suffer harm.</p> <p>The Act requires the local authority to safeguard and promote the welfare of children who are in need, within their geographical area and to request help from specified authorities including General Practices, NHS Trusts, Clinical Commissioning Groups (CCGs) and NHS England.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow</p>

			<p><a href="#">the vital interests of the data subject;</a></p> <p><a href="#">Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law.</a></p> <p><b>Related Legislations:</b></p> <p><a href="#">Section 47 of The Children Act 1989.</a></p> <p><a href="#">Section 45 of the Care Act 2014</a></p>	<p>Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745</p> <p>Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><a href="#">The Care Quality Commission (CQC)</a></p>	<p>The Care Quality Commission (CQC) is a regulatory body established under the Health and Social Care Act. The CQC regulates health and social care services in England to ensure that safe health and care are provided. The law allows CQC to access identifiable patient data/medical records in our clinical system for the purposes of their assessment and investigation of significant safety incident.</p> <p>The data will be shared with the Care Quality Commission, its officers and staff and members of the inspection teams that visit us from time to time.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraph:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraph:</p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued</p>

	<p>The source of the information shared in this way is your electronic GP record.</p>		<p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</a></p> <p><b>Related Legislation:</b></p> <p><a href="#">The Health and Social Care Act 2008, s64</a></p>	<p>processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><b>Law Enforcement and Regulatory Bodies</b></p>	<p>In some circumstances the Practice may be legally required to share personal information with law enforcements and regulatory bodies (without the consent of the data subject) such as: the Police; Courts of Justice; HMRC and DVLA for the purposes of prevention or detection of crime; apprehension or prosecution of offenders; the assessment or collection of any tax or duty or, of any imposition of a similar nature.</p> <p>GPs are obliged to notify the DVLA when fitness to drive requires <i>notification but an</i></p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p><a href="#">Article 6(1) (e) - public interest or in the exercise of official authority.</a></p>	<p>This sharing is a legal and professional requirement and therefore there is no right to object. Personal data processed these purposes are exempt the first data protection principle (processed lawfully, fairly and in a transparent manner).</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE rocess your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane</p>

	<p><i>individual cannot or will not notify the DVLA themselves, and if there is concern for road safety, which would be for both the individual and the wider public.</i></p> <p>EdgCARE will review each request based on its merits before deciding whether to release information to the 'relevant authorities'.</p> <p>The source of the information shared in this way is your electronic GP record.</p>		<p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraph:</p> <p><a href="#">Article 9 (2) (G) – the processing is necessary for reasons of substantial public interest</a></p>	<p>Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><b>Medico-Legal</b></p>	<p><b>Medico-Legal</b> - Where a medical professional is holding personal data for the purpose of providing medical reports in connection with legal action.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraph:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraphs:</p> <p><a href="#">Article 9 (2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the</a></p>	<p>This sharing is a legal and professional requirement and therefore there is no right to object.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>

			<p><a href="#">controller or of the data subject</a></p> <p><a href="#">Art.18 (2): Processing for the establishment, exercise or defence of legal claims.</a></p>	
<p><a href="#">General Medical Council (GMC)</a></p>	<p><b>General Medical Council (GMC)</b> is a public body that maintains the official register of medical practitioners within the United Kingdom. Its primary responsibility is ‘to protect, promote and maintain the health and safety of the public’ by controlling entry to the register, and suspending or removing members when necessary.</p> <p>Under the Medical Act 1983, the GMC has the power to request access to a patient’s medical records for the purposes of an investigation into a doctor’s fitness to practise.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraph:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraph:</p> <p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</a></p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office</p>

			<p><b>Related Legislation:</b></p> <p><a href="#">The Medical Act 1983</a></p>	<p>Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><b><a href="#">The Health Service Ombudsman (HSO)</a></b></p>	<p><b>The Health Service Ombudsman (HSO)</b> was set up by Parliament to provide an independent complaint handling service for complaints that have not been resolved by the NHS in England and UK government departments.</p> <p>The HSO has the power to request access to a patient’s medical records for the purpose of an investigation.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a></p>	<p>The processing of <b>personal data</b> is permitted under the following paragraph:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraph:</p> <p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</a></p> <p><b>Related Legislation:</b></p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House</p>

			<p><a href="#">The Health Services Commissioners Act 1993,s12</a></p>	<p>Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
<p><a href="#">Public Health</a></p>	<p>Public Health England is an executive agency of the Department of Health and Social Care, and a distinct organisation with operational autonomy.</p> <p>The main purpose of the organisation is to protect and improve the health and wellbeing of citizens. These include the management of smoking, alcohol and obesity; management of epidemics and infections such as flu, measles, tuberculosis or outbreaks of food poisoning.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a></p>	<p>The processing of <b>personal data</b> is permitted under the following paragraph:</p> <p><a href="#">Article 6(1) (c) - processing for legal obligation;</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraph:</p> <p><a href="#">Article 9(2) (b) –</a> processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal</p>	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of your personal information;</li> <li>• request rectification of any inaccuracy in your personal information;</li> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> You have a general right to raise an objection to your personal data being shared with the recipient.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow</p>

			<p>products or medical devices.</p> <p><b>Related Legislations:</b></p> <p><a href="#">The Health Protection (Notification) Regulations 2010 (SI 2010/659);</a></p> <p><a href="#">The Health Protection (Local Authority Powers); Regulations 2010 (SI 2010/657)</a></p>	<p>Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745</p> <p>Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
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**Processing for the Purposes of Commissioning, Planning, Research and Risk Stratification**

<p><b>Employment Processing</b></p>	<p>The Practice ensures the protection of the rights and freedoms in respect of the processing of its employees' personal data, in particular for the purposes of the recruitment, obligations performance contract of employment, rights and benefits management planning, health and safety, equality and diversity in the workplace, health and safety at work.</p> <p>The Practice ensures that personal data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England).</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a></p>	<p>The processing of <b>personal data</b> is permitted under the following paragraph:</p> <p><a href="#">Article 6(1) (e) - public interest or in the exercise of official authority.</a></p> <p>The processing of <b>special categories of personal data</b> is permitted under the following paragraph:</p>	<p><b>Employees have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of their personal information held by the Practice;</li> <li>• request rectification of any inaccuracy to their personal information;</li> <li>• restrict the processing of their personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> Employees have a general right to raise an objection to the sharing personal data.</p>
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			<p><a href="#">(2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject</a></p>	<p>If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered.</p> <p><b>Right to complain:</b> If an employee is dissatisfied with the way EdgCARE process his/her personal data, they have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:          Information Commissioner’s Office          Wycliffe House          Water Lane          Wilmslow          Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745          Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
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**Data Processors**

System/database Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing & Data Retention Period	Data Retention Period	Lawful basis General Data Protection Regulation - Article 6 - Article 9 –	Your Rights
Medical Management Systems MMS (Meddbase clinical system)	Medical Management Systems are responsible for the provision of a clinical system called “Meddbase”. This clinical system contains your electronic medical record and is used to store and process this information.	All records held in the Practice EMIS system be kept for the duration specified in the <a href="#">Records</a>	The processing of <b>personal data</b> is permitted under the following paragraph:	<p><b>You have the right to:</b></p> <ul style="list-style-type: none"> <li>To access, view or request copies of your personal information;</li> <li>request rectification of any inaccuracy in your personal information;</li> </ul>

	<p>All information about your personal health records are stored in your GP electronic record. This information is then available to practice staff &amp; external bodies as outlined in this document.</p> <p>Medical Management Systems provide the following summary information in regard to how the Meddbase system complies with GDPR requirements:  <a href="https://www.meddbase.com/data-protection">https://www.meddbase.com/data-protection</a></p>	<p><a href="#">Management Codes of Practice for Health and Social Care</a></p> <p>“GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union.</p> <p>Electronic patient records must not be destroyed or deleted for the foreseeable future.”</p>	<p><a href="#">Article 6(1) (e) - public interest or in the exercise of official authority.</a></p> <p>The processing of <b>special categories of personal data concerning health</b> is permitted under the following paragraph:</p> <p><a href="#">Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</a></p>	<ul style="list-style-type: none"> <li>• restrict the processing of your personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p><b>Right to complain:</b> If you are dissatisfied with the way EdgCARE process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:  Information Commissioner’s Office  Wycliffe House  Water Lane  Wilmslow  Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745  Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
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<p><b>Peninsula UK</b></p>	<p>Peninsula provides practices with a software solution to enable the recording of Human Resources related information of its employees' personal data, in particular for the purposes of the recruitment, obligations performance contract of employment, rights and benefits management planning, health and safety, equality and diversity in the workplace, health and safety at work.</p> <p>The Practice ensures that personal data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England).</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraph: <a href="#">(e) (public interest or in the exercise of official authority)</a>.</p> <p>The processing of <b>special categories of personal data</b> is permitted under the following paragraph:</p> <p>Article <a href="#">9(2) (b)</a>: <a href="#">processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject</a></p>	<p><b>Employees have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of their personal information held by the Practice;</li> <li>• request rectification of any inaccuracy to their personal information;</li> <li>• restrict the processing of their personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> Employees have a general right to raise an objection to the sharing personal data.</p> <p>If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered.</p> <p><b>Right to complain:</b> If an employee is dissatisfied with the way EdgCARE process his/her personal data, they have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:  Information Commissioner's Office  Wycliffe House  Water Lane  Wilmslow  Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745  Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
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<p><b>Paris Partnership Accountancy Services</b></p>	<p>Paris Partnership provides EdgCARE with Payroll services and as such EdgCARE shares data pertaining to employees with Paris Partnership.</p> <p>The Practice ensures that personal data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England).</p>	<p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a>.</p>	<p>The processing of <b>personal data</b> is permitted under the following paragraph: <a href="#">(e) (public interest or in the exercise of official authority)</a>.</p> <p>The processing of <b>special categories of personal data</b> is permitted under the following paragraph:</p> <p>Article <a href="#">9(2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject</a></p>	<p><b>Employees have the right to:</b></p> <ul style="list-style-type: none"> <li>• To access, view or request copies of their personal information held by the Practice;</li> <li>• request rectification of any inaccuracy to their personal information;</li> <li>• restrict the processing of their personal information where: <ul style="list-style-type: none"> <li>✓ accuracy of the data is contested,</li> <li>✓ the processing is unlawful or,</li> <li>✓ where we no longer need the data for the purposes of the processing.</li> </ul> </li> </ul> <p><b>Right to object:</b> Employees have a general right to raise an objection to the sharing personal data.</p> <p>If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered.</p> <p><b>Right to complain:</b> If an employee is dissatisfied with the way EdgCARE process his/her personal data, they have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:  Information Commissioner’s Office  Wycliffe House  Water Lane  Wilmslow  Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745  Email: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p>
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## 8. What do we use anonymised data for?

We use anonymised data to plan health care services. Specifically we use it to:

- check the quality and efficiency of the health services we provide;
- prepare performance reports on the services we provide and,
- review the healthcare we provide in order they are of the highest standard.

## 9. What safeguards are in place to ensure data that identifies me is secure?

We only use information that may identify you in accordance with the EU General Data Protection Regulation 2016. These Legislation requires us to process personal data only if there is a lawful basis for doing so and that any processing must be fair and lawful.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, protect personal and confidential information held on equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it).

Our appropriate technical and security measures include:

- The ability to ensure ongoing confidentiality, integrity, availability and resilience of our systems;
- the ability to quickly restore availability and access to personal information in the event of a physical or technical incident; and
- a process regularly testing, assessing and evaluating the effectiveness of security measures, and ensure they comply with the concept of privacy by design and default.

All Practice staff are trained to ensure information is kept confidential.

We are registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. A copy of the registration is available through the [ICO website](#). You can search by "EdgCARE Ltd" or ICO Data Protection Register number ZA004498.

## 10. What are your rights?

Where information from which you can be identified is held, you have the:

- Right of access to view or request copies of the records
- Right to rectification of inaccurate personal data or special categories of personal data
- Right to restriction of the processing of your data where accuracy of the data is contested, processing is unlawful or where we no longer need the data for the purposes of the processing
- Right to object to any automated individual decision-making
- Right to data portability by requesting the data which you provided to us (not data generated by us) in a structured, commonly used machine readable format. Your right to portability applies only where:
  - data is processed by automated means, and
  - you provided consent to the processing or,
  - the processing is necessary for the fulfilment of a contract

These rights will only apply where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.

**Your right to erasure (right to be forgotten)** will only apply where you had given ‘consent’ to process your personal health data and later withdrew the consent, **and does not apply to the extent** where the processing of your personal health data is necessary for:

- [Compliance with a legal obligation which we are subject to, under the UK law or, for the performance of a task carried out in the public interest or, in the exercise of official authority vested on us;](#)
- [medical purposes and/or for reasons of public interest in the area of public health; archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;](#)  
[the establishment, exercise or defence of legal claims](#)

You can exercise your rights at any time by contacting the Practice (data controller) or the Data Protection Officer (DPO) at the address below, although we will first need to explain how this may affect the care you receive and any overriding legitimate grounds for the processing that may apply.

## 11. Gaining access to the data we hold about you

You have the right to see or have a copy of personal data we hold that can identify you. You do not need to give a reason to see your data. However, some information may be withheld under some exceptional circumstances.

If you want to access your personal information you must do so in writing by **completing our** Subject Access Request (SAR) form which is available at [www.edgcare.net](http://www.edgcare.net) and send it to:

Dr Mark Semler (Data Protection Officer)  
EdgCARE Private Community Family Doctors  
Rear of 96 Edgware Way  
Edgware  
Middlesex  
HA8 8JS  
Tel: 020 3818 9240  
Email: [info@edgcare.net](mailto:info@edgcare.net)

## 12. What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector.

### What sort of information can I request?

In theory, you can request any information that the Practice holds that does not fall under an exemption under the FOI Act. You may not ask for information that is covered by the Data Protection Act or EU General Data Protection Regulation (GDPR) under FOIA. However, you can request this under a Subject Access Request – see section above ‘Gaining access to the data we hold about you’.

## How do I make a request for information?

Your request must be in writing and can be either posted or emailed to:

**Email:** info@edgcare.net

**Post:** Dr Mark Semler (Data Protection Officer)

EdgCARE

EdgCARE Private Community Family Doctors

Rear of 96 Edgware Way

Edgware

Middlesex

HA8 8JS

Tel: 020 3818 9240

Email: info@edgcare.net

## 13. Glossary of Terms

**Common Law of Duty of Confidentiality** - is not written out in one document like the GDPR or an Act of Parliament. Common Law is also referred to as 'judge-made' or case law. In practice, this means that all patient/client information, whether held on paper, computer, visually or audio recorded, or held in the memory of the professional, must not normally be disclosed without the consent of the patient/client. However, where the disclosure/sharing of the patient/client information is for the purpose of Direct Care consent to such disclosure/sharing may be implied where it is informed, given there is a legitimate relationship between the patient/client and the health professional.

**Personal Data** - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Special Categories of Personal Data** – data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.