

# Privacy Notice (Fair Processing Notice)

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## Introduction

Face and Eye understands that your information is important and in the wrong hands it poses a risk to your rights and freedom. Each time we use your data we must have a legal justification to do so. In order to help you protect your information this notice will explain what information we collect, why we collect it, how we collect it, what we do with it, how long we keep it for, who can access it and what your rights are.

## What we need

We need to collect your personal information; by this we mean information which relates to or is obviously about you or from which you can be identified.

This can include but isn't limited to:

- ✓ Any other information from which an individual's identity can be inferred.
- ✓ Genetic and histopathological information.
- ✓ Information concerning physical or mental health.
- ✓ Information regarding political, religious or philosophical beliefs.
- ✓ Any proprietary information belonging to third parties that the company is contractually obligated to protect.

## Why we need it

We need to collect this information to:

- ✓ Carry out our obligations arising from any contracts entered into between you and us including:
  - Care provision
  - Accounting, billing
  - Audits
  - Credit or other payment card verification
- ✓ To provide information about our products and services.
- ✓ Where you have consented to be contacted for such purposes.

## How we collect it

We may collect personal information from a number of different sources included but not limited to:

- ✓ General Practitioner's, optometrists, other consultants, ...
- ✓ Hospitals, both NHS and private
- ✓ Directly from you
- ✓ Third parties (e.g. private insurance companies)

## How we use it

- ✓ To set you up as a patient on Face and Eye system (e-clinic)
- ✓ To provide you with healthcare and related services
- ✓ For account settlement purposes
- ✓ Clinical Audits
- ✓ Communicate with you and resolve any queries or complaints you may have
- ✓ Communicate with any other healthcare individual/professional that you have asked us to update about your care
- ✓ To comply with legal or regulatory obligations
- ✓ To provide, improve, quality training and security
- ✓ Managing our business operations

- ✓ Provide marketing information to you in accordance with preferences you have expressed in the Patient Contact Consent

We will not transfer your data outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

### **How long we keep it**

We generally retain your medical information electronically for a minimum period of 30 years. For further information please request a copy of our Retention Policy.

### **Who we share it with**

We may disclose your information to the third parties listed below for the purposes described, including but not limited to:

- ✓ Doctor, nurse or any other healthcare professional involved in your treatment
- ✓ Other support staff involved in the delivery of your care (e.g. receptionist)
- ✓ Anyone who you have asked us to communicate with or provided as an emergency contact (e.g. next of kin)
- ✓ NHS organisations or other private healthcare providers
- ✓ Other third parties who are involved in your healthcare (e.g. private insurance companies)
- ✓ Private Healthcare Information Network (PHIN)
- ✓ Our body regulators (e.g. Care Quality Commission)
- ✓ Debt collection agencies and other legal bodies, if required

### **How we protect it**

We take appropriate organisational and technical security measures to protect personal information that we hold against unauthorised disclosure or unlawful processing. For further details please request a copy of our Information Security Policy.

### **What are your rights**

- ✓ Request a copy of the data we hold on you.
- ✓ Request that we correct or update the data that we hold on you.
- ✓ Request that we delete the information we hold on you.
- ✓ Request that we keep your data but do not use it.
- ✓ Request that we send a copy of your data to another organisation.
- ✓ Object to how we are using data.
- ✓ Raise a complaint with the Information Commissioner's Office about us.
- ✓ Take us or the Information Commissioner's Office to court.
- ✓ Withdraw consent to process your data at any time.

If you wish to do any of the above, please request a copy of the specific Subject Request Procedure.

Additionally, we must inform you of the following:

- ✓ If we suffer a data breach and your data is affected in a way that it poses a risk to your rights and freedoms.
- ✓ If we carry out your request to correct/update, erase or not use your data.

### **Contact information**

If you would like to know more about anything stated in this privacy notice, please email our Data Protection Officer, Judith Fox, at [judithfox@faceandeye.co.uk](mailto:judithfox@faceandeye.co.uk) or write to 2 Gibwood Road, Manchester, M22 4BT