

**Ash Grove Medical Centre**

**Website Privacy Notice**

## What we do with your information – website user privacy notice

The partners from time to time of Ash Grove Medical Centre of England Lane, kknottingley, WF11 0JA (“**the Practice**”) collect and use personal data about you through this website <http://www.ashgrovesurgery.co.uk/> (“**the Website**”). A current list of partners can be found here: <http://www.ashgrovesurgery.co.uk/staff1.aspx?t=1>.

This notice explains:

- The types of information we collect about you
- The purposes for which we use that information
- Who we may share your information with
- How long we keep information about you for
- Where the information about you is stored
- The rights you have under data protection legislation
- Contact details if you have any queries or concerns about what is said in this notice

### Terms used

This notice talks about “**personal data**”. Personal data is any information relating to a living individual who can be identified from the information.

There are strict rules that apply to “**special personal data**”. This is personal data about:

- Your health (including mental health)
- Genetic data and biometric data where processed to uniquely identify an individual
- Your sex life
- Your sexual orientation
- Your racial or ethnic origin
- Your political opinions
- Your religious or philosophical beliefs
- Any trade union membership

### What information does the Practice use?

The information the Practice collects from you through the website, uses and stores about you includes:

- “**Technical data**”, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- “**Usage data**”, which includes information about how you use our website and services
- “**Communications preference data**”, which includes information about your communications preferences, for example whether you want to hear from us by email

The Practice does not collect special personal data about you using the Website.

### What does the Practice use your information for?

We may use your information to:

- Administer, protect and develop this website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data
- Deliver relevant website content to you and measure or understand the effectiveness of the content we provide
- Use data analytics to improve our website, products/services, marketing, user relationships and experiences

Where possible we will use anonymised personal information, so that individuals cannot be identified.

Under data protection laws, each purpose for which we use your information must comply with one of the GDPR conditions for processing. You can find out more about the conditions for processing here <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>. The table at the end of this notice sets out conditions the Practice relies on when processing website user information for each of the purposes outlined above.

### **Does the Practice share website user information?**

The Practice may need to share website user information with third parties who are contracted to work on its behalf. The main organisations to which the Practice provides your personal data to are described below:

- Organisations that supply us with hosting services, including My Surgery Website
- Software suppliers, including TPP
- Organisations that help us maintain the security and performance of the Website, including My Surgery Website
- Organisations that supply us with website delivery services My Surgery Website

We may also share information:

- With our professional advisors, including lawyers and accountants, if this is necessary to take and receive professional advice (including legal advice), or to bring or defend a legal claim or threatened claim
- With individuals or organisations specified in a court order, or to whom we are legally required to provide information
- Our insurers and the insurers of other organisations (including NHS Resolution) where this is necessary to investigate insurance cover and to handle a claim or threatened claim
- Where we, or substantially all of our assets, are merged or acquired by a third party, in which case this information may form part of the transferred or merged assets
- With organisations that prevent or detect crime, like the police and the NHS Counter Fraud Authority

### **How long will the Practice keep personal data about me for?**

The Practice keeps website user information in accordance to NHS regulations:

In some circumstances we may anonymise website user information so that it can no longer be associated with you, in which case the Practice may use such information without further notice to you.

### **Will the Practice transfer my data outside of the EU?**

The Practice does not transfer website user data outside of the EU.

## **Automated decision-making**

### **What rights do I have?**

The General Data Protection Regulation (GDPR) gives individuals rights about their personal data. Under the GDPR, you have a number of rights. You have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information the Practice holds about you and to check that the Practice is lawfully processing it.
- **Request correction** of the personal information that the Practice holds about you. This enables you to have any incomplete or inaccurate information the Practice holds about you corrected.
- **Request erasure** of your personal information. This enables you to ask the Practice to delete or remove personal information where there is no good reason for the *Practice* continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where the Practice is 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. You also have the right to object where the Practice is processing your personal information for direct marketing purposes or for research/ statistical purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask the Practice to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request a copy of personal data you have provided in a structured, commonly used and machine readable format**

These rights do not always apply.

If we are relying on your consent in order to process your personal data, you are able to withdraw your consent to the processing at any time. You can see when we rely on your consent by looking at the table at the end of this notice.

You can find out more about your rights under the GDPR through the Information Commissioner's Office (“ICO”): <https://ico.org.uk/>

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: **0303 123 1113**

### **Who can I contact at the Practice in relation to my data?**

If you have any questions about how the Practice uses your personal data, your rights or the content of this notice, the Practice has appointed a Data Protection Officer (“DPO”) who is [TBC]. Please contact the DPO at [email address, phone, and address]

If you have any questions, need further information about our privacy practices, would like to let us know that your details require updating or want to make a complaint, please contact The Practice Manager, Ash Grove Medical Centre, England Lane, Knottingley, WF11 0JA.

### **Appealing to the Information Commissioner**

If you do not think that the Practice has complied with your data protection rights you can appeal to the ICO. You can do by contacting <https://ico.org.uk/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: **0303 123 1113**

## CONDITIONS FOR PROCESSING

This table sets out the lawful basis that the Practice relies on to process your personal data for each of the purposes set out in this notice. The articles referred to in the table are in the General Data Protection Regulation, commonly known as the GDPR.

<b>Purpose</b>	<b>Article 6 condition</b>
To register you as a patient on-line	
Manage our relationship with you, which may include notifying you about changes to our terms or this notice, asking you to leave a review or asking you to take a survey, managing your communications preferences or providing you with information that you have requested e.g. a newsletter.	
Administer, protect and develop this website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data.	
Deliver relevant website content to you and measure or understand the effectiveness of the content we provide.	
Use data analytics to improve our website, products/services, marketing, user relationships and experiences.	
To seek and obtain professional advice, including legal advice	
To comply with our legal obligations, including a court order.	
To investigate insurance cover and to handle a claim or threatened claim.	
Practice merger or acquisition.	
The prevention or detection of crime.	