



wrightway
HEALTH WELLBEING

Privacy Notice Information Sheet – Patient Data

This Privacy Notice tells you what to expect in relation to the personal information about you, which is collected, handled and processed by Wrightway Health Ltd on your behalf as a patient.

Wrightway Health Ltd, whose Head Office is at Zone 1 Norwich Research Park, Norwich NR4 7GJ is the Data Controller.

We will process any personal data of yours that we handle in accordance with all applicable data protection laws in force at the time. With effect from 25 May 2018, the General Data Protection Regulations (“GDPR”) will apply. We will also process your data and medical records in accordance with the guidelines set-out by the General Medical Council (GMC), Faculty of Occupational Medicine (FOM) and any other appropriate professional bodies.

The information we may collect

By definition the information we hold in relation to your health is classified as ‘Special Category Data’. Article 9.1 prohibits the processing of a range of personal data including health data except where certain criteria apply.

The Lawful Processing Condition under which we hold and manage your data is Article 9.2(h) which supersedes Article 9.1 :

[9.1 shall not apply where] processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;:

The Legitimate Interest Processing Condition under which we hold and manage your data is Article 6.1(f) - *processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party*. Data is held and managed on behalf of your employer who has a duty of care to comply with the Health and Safety at Work Act as well as other associated laws.

We will also, and subsequent to the above lawful and legitimate reasons for holding your data, we will also ask for your consent.

The information that we may collect, hold and process about you is set out below.

A) At the time of making a booking for your occupational health appointment we will ask you to provide the following data. Where appropriate will ask for your consent to hold this data and will subsequently confirm with you on arrival at your appointment that it is correct.

- **Your name**
- **Your date of birth**
- **Your address**
- **Your email address**
- **Your telephone number(s)**
- **Your employer (where relevant)**

In the event that your appointment is made by another party, and they provide us with your information, we will confirm correctness and where appropriate, your consent for us to hold it, when you attend for your appointment.

B) At the time of, subsequent to and or relevant to your appointment we will also collect

- **Relevant information regarding your health - past and current**
- **Relevant information regarding your current and past employment**
- **Copies of any information sent to us by your employer (where relevant)**
- **Copies of any forms or questionnaires that you have completed**
- **Copies of any notes or opinions made by the clinician**
- **A log of our communications with you by email and telephone**
- **Records as received from other health professionals such as your GP, a specialist consultant, previous OH provider or therapist etc**

This information will have been provided, or will be provided, by you or a third party who we work with, such as your employer, a representative or another occupational Health Provider working on behalf of your employer or another specialist or GP.

Medical Records are managed in line with the GMC regulations and guidance. Consent for processing, storing and disclosing medical records requires consent at all stages.

How we use the information

The above information is used to provide our services to you in our capacity as an Occupational Health Provider.

The information under A above may be used as follows:

- To ensure that your patient record is maintained appropriately
- To send you updates in regards to your renewal dates for medicals and vaccinations

The information under B above may be used as follows:

- To determine your fitness for role, travel, activity or other
- To deal with any medical and health and safety issues relating to your role

- To maintain a record of your health status including details of any certificates issued

How we hold the information

All the personal data we hold is stored on our secure database in the UK. Where paper copies are held awaiting audit and shredding these are held in locked cabinets and in secure premises. Once all records have been saved to the database and an audit for completeness has been conducted the paper copies are securely shredded.

Disclosure of your information

We will not disclose your personal data, medical records or functional information or certification to any person or party other than yourself, unless there is a lawful reason to do so, without your consent.

What is the legal basis for processing the information?

Where appropriate we will rely on your consent to process your personal data.

Where your data is held in regards to Occupational Health Services (the medical service provided was related to your occupation or role regardless of whether you or your employer requested it) consent is not required as per Article 9.2(h):

Your rights

You have the right at any time to ask for a copy of the personal data and or the medical records that we hold about you.

In regards to your personal data we will provide this to you free of charge (provided your request is not manifestly unfounded or excessive). You can request your information by phone or via email to our Information Security Manager ism@wrightwayhealth.co.uk. Prior to providing any information we will require verification of your identity.

In regards to your medical records these can be provided following a written and signed request. This should be sent to our Information Security Manager ism@wrightwayhealth.co.uk or to the Head Office address as above. There may be a charge for the provision of medical records.

Retention of your data

Your data will be retained in accordance with our Records Retention Policy and Protection Policy.

In summary, your patient data and associated medical records will be held until you request them to be removed. We will not automatically delete any record so as to ensure that your occupational health record is maintained as a full and accurate record and available for the duration of your working life.

Any requests for removal will be managed in line with any legal requirements for us to retain the information.

The right to erasure

You have the right to request erasure of your personal data held by us where there

- the data is no longer necessary in relation to the purpose in which it was collected
- where there is no legal ground for us to process your data

- your data has been unlawfully processed

In order to request erasure you should contact us by emailing our Information Security Manager ism@wrightwayhealth.co.uk. On receipt we will confirm whether the data can be erased and if not provide you with the reason.

Any requests for the right for erasure will be managed in line with any legal requirements for us to retain the information.

Concerns

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by emailing our Information Security Manager ism@wrightwayhealth.co.uk. or directly to Information Commissioners Office at <https://ico.org.uk/concerns/>.

Contact

Please address any questions, comments and requests regarding our data processing practices to our Information Security Manager ism@wrightwayhealth.co.uk

Changes to the Privacy Notice

This Privacy Notice may be changed by us at any time.

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