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Data Privacy Policy

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The following policy outlines the approach that West London Surgeon has taken to **protect your data**. We are a fully compliant line with General Data Protection Regulation (GDPR)¹.

Lawfulness, fairness, and transparency principle

Your personal data will be processed lawfully, fairly and in a transparent manner.

Purpose limitation principle

Any data collected is only used for the legitimate purpose we have specified at the time of collection.

Data minimisation principle

We will only gather the data that is reasonably required for our purposes. It is important to keep a record of clinical data of our patients, such as copies of

¹ https://www.cqc.org.uk/guidance-providers/all-services/check-way-you-handle-personal-information-meets-right-standards-0



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scans and investigations, and copies of operation notes. This is so that we may refer to these notes if there is a clinical indication.

It is also helpful to have these records to consult if you require a new operation on the abdomen. Your surgeon may view the location of your previous surgical scar, which might be helpful to plan your new operation.

Accuracy principle

We will take reasonable steps to ensure that the data we hold for you is kept up to date and accurate.

Storage limitation principle

We will not hold data for longer than is necessary. For adult patients this is 8 years after the completion of treatment.

Integrity and Confidentiality principle

At the West London Surgeon we take security very seriously. We store and back-up all data using a cloud computing platform that is ISO 27001



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accredited². This platform acts as a fortress against cyber security threats, and operation risk.

We also use encrypted email to share confidential information. You will notice some emails from us include the word [Encrypt] in the subject line.

When you see this, you will receive an e mail with instructions on how to sign in to 'Proofpoint' (our encryption service) to view and respond to the encrypted message.

For additional security this email is only available for 14 days and cannot be saved locally. When using proofpoint for the first time you will be asked to register before logging in to view your email.

All our incoming email is flagged for its threat level, and our system is continuously learning and making predictions to prevent spear phishing; targeted attacks that impersonate an individual or business that we trust.

² ISO/IEC 27001 is a global standard for information security management systems (ISMS). It defines requirements an ISMS must meet. https://www.iso.org/standard/27001



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Type of personal information we collect

- Patient contact information
- Patient health information
- Prior clinic letters, scans, operation notes
- Clinical investigations, tests, scans, and images
- Insurance information
- Payment details e.g. credit card details.

How we obtain the personal information

- Patient completed questionnaire.
- From your General Practitioner (only with your consent)
- From your medical insurer (only with your consent)

What we will use the information for

- To make a clinical diagnosis
- To plan for treatment
- To process payment/claim medical insurance payment on your behalf



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We will act on a lawful basis and in your legitimate interests where relevant

As your clinician and with your informed consent, with a signed term of engagement.

Who we will share this information with, on a need-to-know basis only

- Other clinicians
- Hospitals and clinics
- Medical insurers
- Our secure data server that is hosted by a third-party provider.

How long we store this information for

We have a legal obligation to store medical records for the following time periods:

Children and young people: until your 25th birthday (or your 26th birthday if you were aged 17 at conclusion of treatment), or 8 years after death.



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All other adults: 8 years after the conclusion of treatment or death.

It is also in your legitimate interest to keep this data so that we may better serve you for any future treatment you may require.

Your consent

You may remove your consent at any time by e mailing us at

contact@westlondonsurgeon.co.uk

Please include your full name, date of birth, address, and the type of information that you wish to withdraw your consent from.

We will provide you with a written confirmation within 15 business days.

Data Audit

We conduct an audit of all the data that we hold an on annual basis to ensure that our records are up to date and compliant with the principles of GDPR as outlined in the policy.



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