

ALS Med – Privacy & Data Protection Policy

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Approved by: Alex Blenkiron, Managing & Clinical Director

Applies to: ALS Med Customers & Services Users, All ALS Med Staff & Volunteers

Website: www.med-als.com

Booking platform: www.bookwhen.com

Information Commissioner's Office (ICO) Registration: ZB933755

ALS Med Ltd (“we”, “us”, “our”) is committed to protecting your privacy and personal information. We take our responsibilities under UK GDPR, the Data Protection Act 2018, the Health and Social Care Act 2008, CQC’s Fundamental Standards, and Information Commissioner’s Office (ICO) guidance extremely seriously. This policy outlines how we collect, use, store, and protect your personal data across our website, booking systems, and clinical operations.

This Privacy & Data Protection Policy applies to anyone who interacts with us, including event medical patients, training delegates, event organisers, staff, volunteers, and individuals using our BookWhen booking site.

1. Who We Are – Data Controller

ALS Med Ltd is the Data Controller for all personal data processed in connection with our services.

Registered address:

ALS Med Ltd

4th Floor, 205 Regent Street, London, W1B 4HH

Data Protection Contact:

Email: info@med-als.com

2. What Personal Data We Collect

We only collect data that we need and that is lawful, necessary, and proportionate.

A. When using our website or BookWhen booking system

- Name
- Email address
- Phone number
- Billing details
- Booking information
- Enquiry messages
- IP address and browser data (for analytics and security)

B. When receiving medical treatment

As a healthcare provider, we may collect:

- Name, date of birth, and contact details
- Next of kin
- Medical history
- Assessment findings
- ePCR records
- Treatment provided
- Incident details
- NHS number (where appropriate)

This information is processed strictly for the provision of healthcare.

C. When you are an event organiser or corporate client

- Business name and contact information
- Event details
- Contractual information
- Financial and invoice details

D. When applying to work with us (staff/volunteers)

- Application details
- Work history
- Qualifications
- DBS
- Right-to-work documentation
- Professional registrations
- Training records

3. Our Legal Basis for Processing

We process personal data under the following lawful bases:

A. Healthcare provision

- Public interest in the provision of healthcare
- Article 9(2)(h) – Health and social care
- Compliance with CQC, safeguarding duties, and the Health and Social Care Act

B. Booking and training services

- Contractual necessity (Article 6(1)(b))

C. Website use and analytics

- Legitimate interests (Article 6(1)(f))

For improving services, ensuring security, and responding to enquiries.

D. Safeguarding, legal or regulatory duties

- Legal obligation
- Vital interests
- Public task

E. Marketing (with consent)

We will only send marketing messages if you opt in.

4. Data Protection Principles We Follow

In line with UK GDPR, we ensure that personal data is:

1. Used lawfully, fairly, and transparently
2. Collected for specific, explicit, and legitimate reasons
3. Limited to what is necessary
4. Accurate and kept up to date
5. Stored only for as long as necessary
6. Kept secure at all times

We also demonstrate accountability through policies, audits, training, and evidence of compliance.

5. How We Use Your Data

We use your data to:

- Provide safe, effective medical treatment
- Maintain accurate clinical records
- Process bookings
- Communicate with you about courses, events, or enquiries
- Issue certificates
- Maintain regulatory compliance (CQC, safeguarding, health & safety)
- Improve our services and website
- Respond to complaints or incidents

We do not sell personal information to any third party.

6. How We Protect Your Data

We use strong technical and organisational measures to keep your information safe:

- Encrypted ePCR systems
- Password-protected and access-controlled folders
- Encrypted cloud storage on UK/EU servers
- Multi-factor authentication for staff accounts
- Regular penetration testing and security audits
- Paper records stored securely and destroyed when no longer required
- Staff confidentiality agreements
- Mandatory annual data protection training
- Secure disposal procedures for digital and paper data

7. Data Retention

We retain data only for as long as required:

- **Medical records:** 8 years for adults, or until a child reaches 25
- **Safeguarding records:** As required by statutory guidance
- **Training records:** 7 years
- **Bookings and enquiries:** Up to 12 months
- **Invoices and financial data:** 7 years
- **Employment records:** In line with HMRC and employment law

When retention periods expire, records are securely destroyed.

8. Sharing Your Data

We share data only when necessary and lawful:

A. For medical care

- NHS Ambulance Services
- Hospitals or urgent care centres
- GP practices (if continuity of care requires it)

B. For safeguarding or legal reasons

- Police
- Social services
- Local safeguarding boards
- Courts

C. For bookings

- BookWhen
- Stripe / PayPal, BACS (for payments)

D. For IT and system support

- Secure, vetted UK/EU-based providers only

We never sell personal information to anyone.

9. Your Rights

Under UK GDPR, you have the right to:

- Access your personal data
- Request corrections
- Request deletion in certain circumstances
- Restrict processing
- Object to processing
- Request a copy of your data (portability)
- Withdraw consent for marketing

- Make a complaint to the ICO

To make a request, email: info@med-als.com

10. Data Breach Reporting

ALS Med Ltd has clear procedures for identifying, managing, and reporting data breaches.

- Any risk to individuals is investigated immediately
- We notify the ICO within 72 hours where legally required
- Individuals affected will be informed if there is a high risk to their rights
- All breaches are logged and reviewed through our governance processes

11. Data Protection Impact Assessments (DPIA)

We conduct a DPIA when processing is likely to result in high risk, such as:

- New digital platforms for ePCR
- Major system changes
- New methods of recording patient information
- High-risk clinical operations

DPIAs help ensure risks are mitigated and protections are in place.

12. Staff Responsibilities

All staff, volunteers, and contractors must:

- Complete mandatory data protection training
- Follow our confidentiality, information governance, and data protection policies
- Report any concerns or breaches immediately
- Only access information necessary for their role
- Use secure systems provided by ALS Med Ltd
- Never store patient data on personal devices

Breach of these rules may lead to disciplinary and/or legal action.

13. Cookies

Our website may use essential and analytical cookies.

Users can control cookies through their browser settings.

A more detailed Cookie Policy can be provided upon request.

14. Children's Information

We may process data relating to children during clinical care or incident management.

This is done strictly under legal, clinical, and safeguarding obligations.

15. International Transfers

We do not transfer data outside the UK or EU without ensuring adequate safeguards.

16. Updates to This Policy

We may update this policy from time to time.

The latest version will always be available on our website and BookWhen page.

17. Contact Us

For data protection requests or questions:

Email: info@med-als.com