

# PATIENT PRIVACY NOTICE

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## IN A NUTSHELL

As your caring medical professional and therefore custodian of personal information relating to your medical treatment, I must only use that information in accordance with all applicable law and guidance. This Privacy Notice provides you with a detailed overview of how I will manage your data (collection, processing, storage and compilation) as per General Data Protection Regulation -GDPR.

Your personal information can be used for a variety of purposes including, but not limited to, providing you with care and treatment, sharing it with other medical professionals and research/clinical audit/ designing of quality improvement projects.

You have a number of rights for instance, a right to seek access to your medical information, how your medical information is utilised, you can request amendments of any information or deletion of information which is no longer required (subject to certain exceptions).

This Privacy Notice also sets out your rights in respect of your personal information, and how to exercise them.

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## About me

1. "I" or "mine" or "my" refers to me as the clinician and my team who is using your personal information.
2. Any queries, comments/suggestions or concerns in respect of the manner in which I have used, or potentially will use, your personal information can be addressed to me directly and I would be happy to discuss further. You can contact me by email: [info@uro-first.com](mailto:info@uro-first.com)

## Your personal data

3. I am a Data Controller in respect of your personal information which I hold about you. This will mainly relate to your medical treatment but will be likely also include other information such as financial data for example in relation to billing. I must comply with the data protection legislation and relevant guidance when handling your personal information and so must any member of my team including the medical secretary who assists me in an administrative capacity.

Your personal data may include any images (radiological/endoscopic/camera) taken in relation to your treatment which must not only be managed in accordance with the law, this Privacy Notice but also all applicable professional standards including guidance from the General Medical Council (GMC) and British Medical Association (BMA).

4. I will provide your treatment from the Private Wing of Eastbourne District General Hospital (UK), Spire Hospital (UK), St Edwards Clinic (Malta), and St James Hospital (Malta). It may be necessary for the either of these hospitals to also process your personal data in accordance with the law, the principles of this Privacy Notice and to the extent that it is necessary in terms of providing further your care in case of referral to other healthcare professionals, and financial billing purposes. In that case, the above mentioned will become a joint Data Controller in respect of your personal information. Your personal information can as well be discussed in a multi-disciplinary meeting of the national health system (NHS) in order to provide you with the best care. If you are referred for treatment or investigations in the NHS or elsewhere as per your wish we will pass on the collected information to ensure continuity of care unless you object. I or my team may update your GP surgery with your care unless you do not wish so.

## What personal information do I collect from my patients?

5. I will use 'special categories of personal information' such as information relating to your Physical, social, medical or surgical treatments, family and mental health.
6. If you provide personal information to me about other individuals (including medical or financial information) you should inform the individual about the contents of this Privacy Notice. I will also process such information in accordance with this Privacy Notice. Our systems will continue to store historical data until recommended as necessary.

## Personal Information

7. As one of my patients, the personal information I hold about you may include the following:-

- a) Name and surname,
- b) Contact details, (address, telephone or mobile numbers, email, GP surgery, emergency contact details, next of kin, and any other contact method you prefer)
- c) Financial information, (bank details, credit card and insurance policy details) for payment purposes, tax and auditing.

## Special Categories Personal Information

8. Information relating to your medical treatment is classified as a special category and will be processed sensitively by my team. This may include the following:-

Details of your current or former physical and/or mental health, including information about any healthcare you have received from other healthcare providers such as GPs, dentists or hospitals (private / NHS), which may include details of clinic and hospital visits, as well as medicines administered. Additional information kept may include nationality, race and/or ethnicity, religion/belief, sexual orientation, sex life, genetic / biometric data related to you,

9. The confidentiality of your medical information is important to me and my team, and I will endeavour to prevent unauthorised access to and use of information provided by me from you. In doing so, I will comply with UK data protection law, including the Data Protection Act 2018 and all applicable medical confidentiality guidelines issued by professional bodies including, but not limited to, the GMC and the Nursing and Midwifery Council.

## How do I collect your information and with who it can be shared (including third parties)?

10. I may collect personal information directly from you and any individual/s you give consent to provide any details about yourself and from a number of different medical and financial record sources (other healthcare/paramedical professionals including medical secretaries, GP surgery, clinics and hospitals – NHS/private, insurance policy provider/s, mental health providers, Commissioners of healthcare services, credit reference agencies, debt collection agencies, Private Healthcare Information Network, Government agencies, including the Ministry of Defence, police, Our third party services providers such as IT suppliers, actuaries, auditors, lawyers, IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers, marketing agencies, document management providers and tax advisers the Home Office and HMRC and others.

## How will I communicate with you?

11. This can include by telephone (landline or mobile), online (programmes like but not limited to DOXY.ME, Microsoft teams/Zoom/Skype etc) SMS, email (cryptic or unencrypted), and/or post. If I attempt to contact you by phone/online and you are not available or else the appointment cannot go forward due to a reasonable cause I may leave limited information for you to identify me, the reason for the call and how to contact me back and this message can be left by myself through an email (cryptic or unencrypted) /SMS/ voicemail and/or answering service.

## Access to information

12. I may 'process' your information for a number of different purposes, and every-time I access the data it will be within a legal justification to do so. The particular justification will depend on the purpose of the proposed use of your data for example and no exhaustive (on your personal request, for an appropriate business and account needs, clinical audits, to exercise or defend my legal rights including the hospitals and clinics where care has been provided, for reasons of substantial public interest under UK law, a wide range of legal and regulatory responsibilities which is not possible to list fully, to provide and support your healthcare and more).

13. The Data Protection Act 2018 gives you the right to exercise the access of the information kept about you. Any data subject access request will be formally assessed and managed according to our data subject access request policy. I and my team will endeavour to respond all requests within the required time scale of one calendar month and in highly complex cases I or my team can extend this period to three months as per law.

## Medical research

14. Your information can be shared with UK registries for which ethical approval is not necessarily required but which form part of the National Clinical Audit programme hosted by NHS England and who provide a list of National Clinical Audit and Clinical Outcome Review programmes and other quality improvement programmes. I may do so without your consent provided that the particular audit registry has received statutory approval, or where the information will be provided in a purely anonymous form, otherwise your consent will be needed and either I will seek this from you or the registry themselves will do so..

15. On occasional basis I and my team are required by law to conduct audits of health records, including medical information, for quality assurance purposes. Your personal and medical information will be treated in accordance with guidance issued by the Care Quality Commission (England), Health Inspectorate Wales and Healthcare Improvement Scotland and for patients living in Malta by the Public Health Authority.

16. I may also be asked to participate in medical research and share data with ethically approved third party research organisations. I or the research agency will seek your consent in these circumstances. However some research projects will have received statutory approval or public interest for statistical or scientific research such that consent may not be required in order to use your personal data. In those circumstances, your personal will be shared. Your privacy/anonymity will be maintained.

17. The Private Healthcare Information Network (“**PHIN**”) is an organisation who will monitor outcomes of patients who receive private treatment. Under Article 21 of that Order, I am required to provide PHIN with information related to your treatment, including your NHS Number in England and Wales, CHI Number in Scotland or Health and Care Number in Northern Ireland), the type of procedure you underwent, any complications/ need for

readmission/admission to any hospital including the NHS and also the feedback you provided as part of any PROMs surveys and monitor any follow up treatment/s.

Only after you have consented to me or my team I will only share this information with PHIN. The records that I share may contain personal and medical information about patients, including you. PHIN will comply to the highest standards of managing your personal information in accordance with data protection laws and confidentiality. Any information that is published by PHIN will be anonymised in a statistical form and will not be shared or analysed for any purpose other than those stated. Further information is found at [www.phin.org.uk](http://www.phin.org.uk).

### How long do I keep personal information for?

18. I will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with my legal and regulatory obligations. Further information regarding the periods for which your personal information will be stored can be requested on [info@uro-first.com](mailto:info@uro-first.com)

### Your data protection rights

You can object to the use of your personal data. The following rights apply, to European residents.

#### **19 Your right of access**

You have the right to ask us for copies of your personal information.

#### **20 Your right to rectification**

You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. Third parties may be updated accordingly.

#### **21 Your right to erasure**

You have the right to ask us to erase your personal information in certain circumstances. Third parties may be updated accordingly.

#### **22 Your right to restriction of processing**

You have the right to ask us to restrict the processing of your personal information in certain circumstances. Third parties may be updated accordingly.

#### **23 Your right to object to processing**

You have the the right to object to the processing of your personal information in certain circumstances. Third parties may be updated accordingly.

## 24 Your right to data portability

You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. In complex cases this may be extended to 3 months.

## How to complain

25 If you have any concerns about our use of your personal information, you can make a complaint to us at [info@uro-first.com](mailto:info@uro-first.com).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

EU residents have a right to lodge a complaint with their local data protection supervisory authority (i.e. your place of habitual residence, place or work or place of alleged infringement). We ask that you please attempt to resolve any issues with us before your local supervisory authority.

## National Data Opt-Out Programme

26. Through the NHS Digital all patients will be able to log their preferences as to sharing of their personal information. All health and care organisations will be required to uphold patient choices.

## Updates to this Privacy Notice

27. I may update this Privacy Notice to ensure that it remains accurate. If changes result in any major material difference in how your personal data is managed then I will provide you with an updated copy of the Policy.