

Berkshire Aviation Medicals – Data Privacy Policy

Introduction

- Berkshire Aviation Medicals carries out aviation medicals for pilots
- Registering as a client with Berkshire Aviation Medicals creates a legitimate interest in storing and using your information in accordance with General Data Protection Regulation (GDPR) and the Data Protection Act 2018
- GDPR Article 9, Paragraph 2 (h):
 - 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;
- For aviation medical examinations conducted on behalf of the UK Civil Aviation Authority (CAA), the CAA is the Data Controller for your personal information uploaded to Cellma, and I act as the Data Processor
- For the personal information I hold about you, I am the Data Controller, and I am registered with the Information Commissioner's Office (ICO) – reference number ZB652203

What personal information is held?

- Contact details (e.g. home address, telephone numbers, email address, etc.)
- Information about your physical and mental health, results of medical examinations, etc.

How do I share/store your personal information?

- Electronic data is held on an encrypted and password protected laptop used solely for aviation medical purposes
- Cloud-based backup is encrypted and provided via Microsoft Office 365 for Business Premium, which meets or exceeds all current national and international security standards
- Hardcopy documents will be immediately scanned and then shredded
- ECGs that 'Require Over Read' (ROR) are transmitted to a nominated Consultant Cardiologist via encrypted email

Retention Period

For aviation medical clients, we are required by the CAA to hold your medical records until such time as we cease providing aeromedical services due to retirement or closure of the business.

Your rights as a data subject

- The UK GDPR gives individuals specific rights over their personal data. For general data processing under the UK GDPR, in summary these are:
 - the right to access personal data held about them (the right of subject access)
 - the right to be informed about how and why their data is used - and you must give them privacy information
 - the rights to have their data rectified, erased or restricted
 - the right to object
 - the right to portability of their data
 - the right not to be subject to a decision based solely on automated processing

<https://ico.org.uk/global/privacy-notice/your-data-protection-rights/>

Complaints to the Information Commissioner's Office (ICO):

In the event that you wish to complain about how your personal data is being processed by Berkshire Aviation Medicals or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority:

<https://ico.org.uk/make-a-complaint/>

Medical Confidentiality

I fully comply with best practice standards of medical confidentiality as detailed in UK law and UK General Medical Council (GMC) regulations.

Consent

By consenting to this privacy policy you are giving me permission to process your personal data specifically for the purposes identified.

You may withdraw consent at any time by contacting me:

contact@berkshireaviationmedicals.co.uk