

Privacy Notice – Service Users & Employees

In this document Thaxted Pharmacy Ltd will be referred to as “The company”. This privacy policy explains how we use any personal information we collect about you when you use our pharmacy services.

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Data protection principles

The Data Protection Act 2018 (DPA 18) covers information held by service providers about their clients and their employees. There are certain legal rights relating to the storage and processing of information, and this policy sets out the basis on which Thaxted Pharmacy Ltd (from now on known as “the company”) holds personal data about its patients and its employees.

Thaxted Pharmacy Ltd will collect, hold and process personal data, including sensitive personal data, about all patients that use one of our pharmacies, whether regularly or temporary. Thaxted Pharmacy Ltd will collect, hold and process personal data about all employees and locums of the company. These patients and employees are referred to in the DPA 2018 as “data subjects”.

The purpose for which the company holds any information about patients as data subjects is for the provision of healthcare services and marketing. The purpose for which the company holds any information about employees as data subjects is for the provision of employment.

Service Users Privacy Notice

Who is responsible for Data Protection?

The named pharmacist who is responsible for Data Protection in this company is Mike Barbour. He is responsible for data protection compliance within the company.

The Data Protection officer for the company is Mike Barbour.

His contact details are mail@thaxtedpharmacy.co.uk

What information do we collect about you?

Our pharmacists and their staff are members of your local healthcare team.

They aim to provide you with the highest quality of healthcare. To do this they need to keep records about you, your health and the care we have provided or plan to provide for you. We know that you value your privacy and the security of personal information held about you.

As part of providing a professional, safe and efficient service, there is certain information that we record. This includes details of drugs and appliances dispensed against NHS prescriptions as well as significant advice given, and referrals made to other health professionals and any other relevant information.

Information recorded may include:

- basic details about you, such as address, date of birth, next of kin.
- records of medicines you have been prescribed by your doctor or another qualified prescriber, and which have been supplied by this pharmacy.
- details of medicines purchased from the pharmacy without a prescription (“over the counter medicines”).
- other details and notes about your health and medical treatment.
- information relevant to your continued care from other people who care for you and know you well, such as other health professionals and relatives; and
- any other services we provide to you, for example, a flu vaccination, your telephone number, preferred delivery address details if you require delivery or your preferred contact method if you wish to receive email or SMS notifications regarding your prescriptions or other pharmacy services.

Furthermore, we also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. Website usage information is collected using cookies.

How will we use the information about you?

We process your personal data, which includes information from your prescriptions and any other pharmacy and health care services we provide to you (including medicines use reviews, flu vaccinations, stop smoking services, delivery service, email & SMS alerts etc.) for the purposes of:

Your care – providing pharmacy services and care to you and, as appropriate, sharing your information with your GP and others in the wider NHS.

Our payments – sharing your information with the NHS Business Services Authority, others in the wider NHS, and sometimes Local Authorities, and only limited information to those external to the NHS who negotiate and check the accuracy of our payments; and,

Management – sharing only limited information with the NHS Business Services Authority and others in the wider NHS, and sometimes Local Authorities; as well as those external to the NHS who ensure we maintain appropriate professional and service standards and that your declarations and ours are accurate. This includes, for example, our indemnity insurance provider.

We hold your information for as long as advised by the NHS and as per standard operating procedure (SOP) on “record keeping”.

We process your personal data in the performance of a task in the public interest for the provision of healthcare and treatment. A pharmacist is responsible for the confidentiality of your information.

The company will not share your information for marketing purposes with companies outside our group.

Marketing

If you ever consent to receiving marketing materials from us, you may opt out at any time. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us.

Your Rights

You have the right to confidentiality under the General Data Protection Regulation and [the Data Protection Act 2018] and the common law duty of confidence.

We also comply with the NHS Code of Practice on Confidential Information and pharmacists have a requirement under their professional standards to keep records about you confidential, secure and accurate.

All of our staff contracts of employment contain a requirement to keep patient information confidential.

Our guiding principle is that we process your records in strict confidence.

Access to your information and correction

You have the right to ask for a copy of all pharmacy records about you (generally in paper or electronic form).

Generally, there will be no charge for a printed copy of the information we hold about you. We are required to respond to your request within one month.

You will need to give adequate information in order for pharmacy staff to identify you (for example, full name, address and date of birth). You will be required to provide ID, for example a passport, full driving licence or credit/debit card before any information is

released to you.

If you think any information we hold on you is inaccurate or incorrect, please let us know. You may object to us holding your information.

You may lodge a complaint with the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

Other websites

Our website contains links to other websites. This Privacy Notice only applies to this website so when you link to other websites you should read their own Privacy Notices.

Changes to our privacy Notice

We keep our Privacy Notice under regular review and we will place any updates on our web page. This privacy Notice was last updated on 23 May 2018.

How to contact us

Please contact us if you have any questions about our Privacy Notice or information we hold about you:

Thaxted Pharmacy Ltd, PO Box 1452, Peterborough, PE2 2WA, Telephone: 01832 270828,

Email: mail@thaxtedpharmacy.co.uk

Employees Privacy Notice

1. As your employer, the Company (Thaxted Pharmacy Ltd) needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations, and we will tell you about the implications of that decision.
2. As a company pursuing **Retail NHS Community Pharmacy** activities, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. We will never process your data where these interests are overridden by your own interests.
3. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees.
4. The sort of information we hold includes your application form and references, your contract of employment and any amendments to it; correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records; driving license details and driving offences; criminal record checks and any relevant records.
5. You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company. You should refer to the company IG policies for details of how we keep data secure.
6. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay.

7. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
8. In addition, we may monitor computer and telephone/mobile telephone use, as detailed in our staff handbook
9. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our external payroll provider, pension or health insurance schemes, human resources advice providers, professional indemnity providers or vehicle insurance providers.
10. We may transfer information about you to other group companies for purposes connected with your employment or the management of the company's business.
11. Your personal data will be stored for a period of six months after your contract of employment with the company ends. After this time your records will be securely destroyed. The only exception to this is your training records which we are required to retain for ten years, and a record of your employment start date, finishing date and job title. All payroll data is kept for seven years for compliance with UK tax law.
12. If in the future we intend to process your personal data for a purpose other than that which it was collected, we will provide you with information on that purpose and any other relevant information.

Your Rights

13. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have several rights with regard to your personal data. You have the right to request from us access to and rectification or erasures of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.
14. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

15. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

Identity and contact details of controller and data protection officer

16. **Thaxted Pharmacy Ltd** is the controller of data for the purposes of the DPA 18 and GDPR.

17. If you have any concerns as to how your data is processed, you can contact:

Mike Barbour, Data Protection Officer at mail@thaxtedpharmacy.co.uk
or you can write to her using the address of:

Thaxted Pharmacy Ltd, PO Box 1452, Peterborough, PE2 2WA