



Privacy Notice

PAGDPRPOL15v2

CONTENTS:

1. Background 3

2. Data Controller 3

3. Information About our Company 3

4. What Does This Notice Cover? 3

5. What Is Personal Data? 3

6. What Are My Rights? 4

7. What Personal Data Do We Collect and How? 5

8. How Do You Use My Personal Data? 6

9. How Long Will You Keep My Personal Data? (Retention Period) 7

10. How and Where Do You Store or Transfer My Personal Data?..... 8

11. Do You Share My Personal Data? 8

12. How Can I Access My Personal Data?..... 8

13. How Do I Contact You? 9

14. Information Commissioners Office 9

15. Changes to this Privacy Notice..... 9

1. Background

The Patient Advocate Group of companies, referred to as the “Company”, understands that your privacy is important to you and that you care about how your personal data is used. The respects and values the privacy of all of our clients and individuals and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

2. Data Controller

Patient Advocate Ltd, (the Company) as Data Controller, make decisions about processing activities. We exercise overall control of the personal data being processed and are ultimately in charge of and responsible for the processing.

3. Information About our Company

Patient Advocate Group:

Registered address of all Group companies: Thames House, Roman Square, Sittingbourne, Kent ME10 4BJ

Main trading address: 1 Cornhill, London EC3V 3ND.

Data Protection Officer: Julie Yarlett

Email: dataprotectionofficer@patientadvocate.co.uk

Telephone: +44(0) 20 7160 9735

Postal Address: 1 Cornhill, London EC3V 3ND

Representative: Michael Brown

Email: micheal@patientadvocate.co.uk

Telephone: +44(0) 20 7160 9735

Postal Address: 1 Cornhill, London EC3V 3ND

4. What Does This Notice Cover?

This Privacy Information explains how the Company use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

5. What Is Personal Data?

Personal data is defined by the *General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”)* as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that the Company use is set out in Part 7, below and includes processing of Health and Clinical data, with express consent from the Individual/Patient.

6. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which the Company will always work to uphold:

- a) The right to be informed about the Company collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- b) The right to access the personal data the Company hold about you. Part 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by the Company is inaccurate or incomplete. Please contact us using the details in Part 13 to find out more.
- d) The right to be forgotten, i.e. the right to ask the Company to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 13 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to the Company using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if the Company are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to the Company directly, the Company are using it with your consent or for the performance of a contract, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. The Company does not use your personal data in this way Part 8 explains more about how the Company use your personal data.
- j) For more information about the Company use of your personal data or exercising your rights as outlined above, please contact us using the details

provided in Part 13.

It is important that your personal data is kept accurate and up to date. If any of the personal data the Company holds about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about the Company use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. The Company would welcome the opportunity to resolve your concerns, so please contact the Company's Data Protection Officer using the details in Part 13.

7. What Personal Data Do We Collect and How?

Depending upon your use of the Company site, the Company may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table.

We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Title, Name and Date of Birth, Address, email address and contact phone number	Completion of online form or completing a consent and referral form.
GP Name, Address, Contact phone number and medical reason for referral	Completion of online form or completing a consent and referral form.
Business information including Business name, job title and address.	Contractual agreement
PayPal.	Purchase of our case management service via our website online.
Bank Account and Bank Cards details.	Companies that have directly purchased our case management services for their employees
Data from third parties. Name, address, email address	Issued from a Company that has signed up for our case management services for their employees.

The following personal data is collected, held, and processed by the Company (for details of Data Retention, please refer to the Company Retention Policy):

Data Ref: Type of Data Purpose of Data
BD1: Biographic Data Check Eligibility for Service
CD1: Clinical Data Service individual's health needs appropriately
RD1: Referral Data To ensure we can service any referrals investigations / consultation data – and manage Policy benefit limits and service appropriately.

8. How Do You Use My Personal Data?

Under the Data Protection Legislation, the Company must always have a lawful basis for using personal data. The following table describes how the Company use your personal data, and our lawful bases for doing so:

Purpose/Activity	Type of Data	Our Lawful Basis
To register you as a new client	Contact name, Business name, business email and business contact phone number and Company number.	Performance of a contract
Enquiring about our Company and its work	Name and email.	Consent - you have given your active consent.
Signing up as a member	Name, email, date of birth, dependent names.	Contract – by paying for our case management services, you have entered into a contractual relationship with us as set out in our membership terms and conditions.
Provide Case Management	Name, address, date of birth, contact number and email address	Contract – we have a contractual obligation with you directly or with your employer for you to access our services.
Employee/Individual Case Management	Name, address, date of birth, contact number, email address, GP details, hospital and consultant details, health data, medical/clinical data, referral details and/or employer details for employee members only.	Consent – you have completed our consent for us to manage your health needs.

With your permission and/or where permitted by law, the Company may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam.

The Company will always work to fully protect your rights and comply with the Company obligations under the *Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003*, and you will always have the opportunity to opt-out.

The Company will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

The Company does not use automated systems for carrying out decision-making. The Company does not use profiling.

The Company will only use your personal data for the purpose(s) for which it was originally collected unless the Company reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If the Company do use your personal data in this way and you wish would like an explanation on how the new purpose is compatible with the original, please contact the Company using the details in Part 13.

If the Company need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, the Company will inform you and explain the legal basis, which allows the Company to do so.

In some circumstances, where permitted or required by law, the Company may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

9. How Long Will You Keep My Personal Data? (Retention Period)

The Company will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How long do we keep It - Retention period
Title, name, date of birth, GP details, hospital and consultant details, health, medical, clinical and referral details	1 year the duration of the contract, if contract is renewed we will retain your information for the duration, if you cancel the contract your details will be removed from our database within 1 month of the contract expiry date, unless we are required by law to keep the data for longer. You will be informed if this is the case.

<p>Address, email address, contact phone number</p>	<p>1 year or the duration of the contract, if a contract is renewed we will retain your information for the duration, if you cancel the contract your details will be removed from our database within 1 month of the contract expiry date, unless we are required by law to keep the data for longer. You will be informed if this is the case.</p>
<p>Business name, address, contact phone number and email address</p>	<p>Usually 1 year or for the duration of our contractual obligations, if the contract is renewed, we will retain the information until the contract expires.</p>
<p>Bank Account and Bank Cards details.</p>	<p>7 years.</p>

10. How and Where Do You Store or Transfer My Personal Data?

The Company only store and transfer data within the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to our Company and to protect your data, the Company take a number of important measures, including the following:

- Limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- Procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where the Company is legally required to do so;

11. Do You Share My Personal Data?

The Company will **not** share any of your personal data with any third parties for any purposes, subject to the following exceptions:

- If we sell, transfer or merge the Company or parts of the business or assets, your personal data may be transferred to a third party. Any new owner of the Company may continue to use your personal data in the same way(s) that the Company have used it, as specified in this Privacy Policy.
- In some limited circumstances, the Company may be legally required to share certain personal data, which might include yours, if the Company are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

12. How Can I Access My Personal Data?

If you want to know what personal data the Company have about you, you can ask for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "*subject access request*".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell the Company everything the Company needs to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover the companies' administrative costs in responding.

The Company will respond to your subject access request within one month of receiving it. Normally, the Company aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the

date the Company receive your request. You will be kept fully informed of our progress.

13. How Do I Contact You?

To contact the Company about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Julie Yarlett):

Email address: dataprotectionofficer@patientadvocate.co.uk.

Telephone number: +44(0) 20 7160 9735.

Postal Address: 1 Cornhill, London EC3V 3ND.

14. Information Commissioners Office

Should you have any concerns re the security and protection of your personal data, you have the right to contact the Information Commissioners Office:

Address:
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

15. Changes to this Privacy Notice

The Company may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if the Company change its business or operating procedures in a way that affects personal data protection.

Any changes will be made available on the Company website. This Privacy Notice was last updated on 28th October 2020.