

Introduction

Welcome to Cegedim Rx's Healthi Services Privacy Notice.

Cegedim Rx respects privacy and is committed to protecting personal data. This privacy notice will advise how we look after personal data collected through any of our applications, including internet based applications (regardless of how they are accessed) and provide information regarding privacy rights and how the law protects them.

This privacy notice is provided in a layered format so specific areas set out below can be selected. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- Important information and who we are
- The data we collect
- What types of personal data do we handle?
- How is personal data collected
- Where do we collect personal data from
- If personal data is not provided
- Sharing personal information
- Retaining information
- Security of personal information
- How we use personal data
- Opting out
- Change of Purpose
- Disclosures of personal data
- International transfers
- Data security
- Data retention
- Legal rights
- Cookies
- Glossary

Important information and who we are

Purpose of this privacy notice

This privacy notice aims to provide Cegedim Rx customers (GP, Pharmacy, Hospital, Optometrist etc.) with information on how we collect and process personal data through use of this application and any defined associated services.

It is important that this privacy notice is read together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data so that there is transparent awareness of how and why we are using the data. This privacy notice supplements the other notices and is not intended to override them. The Cegedim Rx website contains the core business [Privacy Policy](#)

Processor

Cegedim Rx Limited is the Data Processor and responsible for any Cegedim Rx customer or business personal data held by Cegedim Rx (collectively referred to as "Cegedim", "we", "us" or "our" in this privacy notice). The clinician (GP, Pharmacy, Hospital, Optometrist etc.) is the Data Controller. The patient is the Data Subject.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to our privacy notice. If there are any questions about this privacy notice, including any requests to exercise legal rights, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Cegedim Rx Limited

Name of DPO: Jenny Williams

Email address: DPO@cegedimrx.co.uk

Postal address: Cegedim House, Marathon Place, Leyland, Lancashire, PR26 7QN

ICO Reference: Z4925208

There is the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with any concerns before approaching the ICO so please contact us in the first instance.

Changes to the privacy notice and the duty to inform us of changes

This version was last updated on the 8th of March 2019 and historic versions can be obtained by [contacting us](#).

It is important that the personal data we hold is accurate and current. Please keep your clinician advised if personal data changes during the use of this service.

Third-party links

This application may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our service, we encourage you to read the privacy notice of every website you visit.

The data we collect

We collect and use information for the purposes of supporting the administration and delivery of health services to patients by healthcare professionals.

These purposes include:

Making and managing health records

Recording clinical events

Research and analysis

Financial management and administration

What types of personal data do we handle?

We process personal information to enable us to support the provision of healthcare services to patients.

We also use information to support and monitor the health services commissioned in the United Kingdom to enable the delivery of high quality healthcare. This type of information will usually be provided to the NHS in an aggregate or anonymised form, so that we cannot identify an individual.

The types of personal information we use include:

- Personal details such as names, addresses, telephone, NHS numbers
- Family details for example next of kin details
- Employment details, for example as to what occupational category
- Services, for example details of the services access or offered by providers
- Lifestyle and social circumstances
- Details held in the patient's record, where we hold or manage the patient's record
- Responses to surveys, where individuals have responded to surveys about healthcare issues
- We also process sensitive classes of information that may include:
 - Racial and ethnic origin
 - Religious or similar beliefs
- In terms of patient information, information may include:
 - Physical or mental health details
 - Sexual life

How is personal data collected

Data is collected by Healthcare professionals in the process of delivering clinical services to a patient.

Demographic Data is sourced from either of two methods; 1/ Information extracted from an integrated pharmacy dispensing system (Pharmacy Manager) and/or 2/ Information manually entered by the healthcare professional at the point of service delivery.

Where do we collect personal data from

- Manual Input by a healthcare professional at the point of service delivery
- Integrated Pharmacy Dispensing System
- The NHS (NHS Number lookup)

If personal data is not provided

Where we need to collect personal data by law, or under the terms of a contract and this data is not provided when requested, we may not be able to perform the contract we have or are trying to enter into (for example, to provide goods or services). In this case, we may have to cancel provision of a product or service but we will notify if this is the case at the time.

Sharing information

There are a number of reasons why we share information. This can be due to:

Our obligations to comply with current legislation

Our duty to comply with our NHS Commissioners

Consent to disclosure has been provided

Retaining information

We will only retain information for as long as necessary. Records are maintained in line with the [NHS England retention schedule](#) which determines the length of time records should be kept.

Security of information

We take our duty to protect personal information and confidentiality seriously. We are committed to taking all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible.

We have appointed a "Senior Information Risk Owner" (SIRO) who is accountable for the management of all information assets and any associated risks and incidents, and a "Caldicott Guardian" who is responsible for the management of patient information and patient confidentiality.

How we use personal data

Use of the NHS Number

If support is being provided from a public health service. We may share an NHS Number with the relevant clinician (GP, Pharmacy, Hospital, Optometrist etc.) (Only if explicit consent is given). This is so that Healthi Services and the relevant clinician (GP, Pharmacy, Hospital, Optometrist etc.) are using the same number for identification whilst providing care.

An NHS Number may be accessed through an NHS Service called the *Personal Demographics Service (PDS)*, Healthi Services sends basic information such as name, address and date of birth to the PDS in order to find the NHS Number. Once retrieved from the PDS the NHS Number is stored in the Healthi Services System. This is dependent on the service used.

The addition of the NHS Number to public health data will bring additional benefits:

- Better coordinated and safer care across public health care bodies enabled through the sharing of real-time information.
- Less paperwork and more efficient use of public health care resources.

Data Subjects have the right to object to the processing of their NHS Number in this way. This will not stop care being provided, but will result in the benefits outlined above not being realised. To help decide, the clinician (GP, Pharmacy, Hospital, Optometrist etc.) will discuss with the data subject how this may affect the ability to provide care, and any other options.

Personal Demographic Service (PDS)

Demographic information including NHS Numbers are traced using the Personal Demographic Service (PDS) provided by NHS Digital.

Once patient demographic information has been traced using the PDS, it is used in the following ways to support practises within the organisation:

- To improve the quality of referrals being passed from optical practices to the hospitals, clinics or optometrists, ensuring that patient records coming from Healthi Services align to the patient records that are held within NHS systems.
- To perform end to end / regression testing in the development and testing of the PMR software

Opting Out

Data Subjects can withdraw consent at any time where consent is relied on to process personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn. If consent is withdrawn, we may not be able to provide certain products or services. The Data Subject will be advised by the clinician (GP, Pharmacy, Hospital, Optometrist etc.) if this is the case at the time consent is withdrawn.

Consent can be withdrawn by contacting the clinician (GP, Pharmacy, Hospital, Optometrist etc.).

Change of purpose

We will only use personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If data subjects wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the clinician (GP, Pharmacy, Hospital, Optometrist etc.).

If we need to use personal data for an unrelated purpose, we will notify the Data Controller and we will explain the legal basis which allows us to do so.

Please note that we may process personal data without data subject knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Third Parties as set out in the Glossary.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use personal data for their own purposes and only permit them to process personal data for specified purposes and in accordance with our instructions.

International transfers

We do not transfer personal data outside the European Economic Area (EEA).

Data security

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify data controllers and any applicable regulator of a breach where we are legally required to do so.

We are an ISO27001:2013 accredited business.

Data retention

How long will you use personal data for?

We will only retain information for as long as necessary to fulfil the purposes we collected it for. Records are maintained in line with the [NHS England retention schedule](#) which determines the length of time records should be kept.

Legal rights

Under certain circumstances, data subjects have rights under data protection laws in relation to personal data. Please click [here](#) to find out more about these rights:

If a data subject wishes to exercise any of these rights, they should contact the Clinician in the first instance.

No fee usually required

Data Subjects will not have to pay a fee to access their personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

Cookies

We may use essential cookies to authenticate users and prevent fraudulent use of user accounts. Information on our cookie policy and the cookies we use can be found in our Cookies Policy.

Glossary

Terms of Responsibility

Data Controller

The Data Controller determines the. Purposes for which and the manner in which any personal data are, or are to be processed.

Data Processor

The Data Processor, in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Data Subject

A data subject is any person whose personal data is being collected, held or processed.

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to provide the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on the data subject (both positive and negative) and their rights before we process personal data for our legitimate interests. We do not use personal data for activities where our interests are overridden by the impact on the data subject (unless we have consent or are otherwise required or permitted to by law). Further information about how we assess our legitimate interests against any potential impact on the data subject in respect of specific activities by contacting the clinician (GP, Pharmacy, Hospital, Optometrist etc.)

Performance of Contract means processing data where it is necessary for the performance of a contract.

Comply with a legal or regulatory obligation means processing personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

Internal Third Parties

Other companies in the Cegedim Group acting as joint controllers or processors and who are based in the United Kingdom or France and provide IT and system administration services and undertakes leadership reporting.

External Third Parties

Healthcare providers acting as joint controllers or processors who provide healthcare services, including providing access to consolidated patient records across a multi-site healthcare service provider.

Healthcare providers acting as joint controllers or processors who provide pharmaceutical and/or medicines management products or services.

Healthcare payment intermediaries acting as processors who manage payments and reimbursement to National Health Service (NHS) entities or non-NHS providers in relation to healthcare products or services being provided.

Service providers acting as processors based in the United Kingdom who provide IT and system administration services.

Service providers acting as processors based out of the United Kingdom who provide IT and system administration services.

Third Party providers;

NHS

Stacks – Barcelona developers

FDS – NHS Supplier

Data Subject Legal Rights

Data Subjects have the right to:

- Request access to personal data (commonly known as a "data subject access request"). This enables them to receive a copy of the personal data we hold and to check that we are lawfully processing it.
- Request correction of the personal data that we hold. This enables the data subject to have any incomplete or inaccurate data we hold corrected, though we may need to verify the accuracy of the new data provided to us.
- Request erasure of personal data. This enables the data subject to ask to delete or remove personal data where there is no good reason for us continuing to process it. There is also the right to ask us to delete or remove personal data where the data subject has successfully exercised the right to object to processing (see below), where we may have processed information unlawfully or where we are required to erase personal data to comply with local law. Note, however, that we may not always be able to comply with a request of erasure for specific legal reasons which will be notified, if applicable, at the time of request.
- Object to processing of personal data where we are relying on a legitimate interest (or those of a third party) and there is something about the particular situation which makes the Data Subject want to object to processing on this ground as they feel it impacts on their fundamental rights and freedoms. The Data Subject also has the right to object where we are processing their personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process the information which override their rights and freedoms.
- Request restriction of processing of personal data. This enables the data subject to ask us to suspend the processing of personal data in the following scenarios: (a) to establish the data's accuracy; (b) where our use of the data is unlawful but the data subject do not want us to erase it; (c) where the data subjects needs us to hold the data even if we no longer require it as they need it to establish, exercise or defend legal claims; or (d) they have objected to our use of personal data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of personal data to the data subject or to a third party. We will provide to the data subject, or a third party they have chosen, personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which the data subject initially provided consent for us to use or where we used the information to perform a contract.

- Withdraw consent at any time where we are relying on consent to process personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn. If the data subject withdraws consent, we may not be able to provide certain products or services. We will advise if this is the case at the time consent is withdrawn.

Cookies Policy

Last updated: 08/03/2019

Cegedim Rx ("us", "we", or "our") uses cookies on <https://healthi.cegedim.com> (the "Service"). By using the Service, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What are cookies

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

How Cegedim Rx uses cookies

When you use and access the Service, we may place a number of cookies files in your web browser.

We use essential cookies on the Service to authenticate users and prevent fraudulent use of user accounts.

What are your choices regarding cookies

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

Where can you find more information about cookies

You can learn more about cookies and the following third-party websites:

- AllAboutCookies: <http://www.allaboutcookies.org/>
- Network Advertising Initiative: <http://www.networkadvertising.org/>