

FAIR PROCESSING NOTICE

HEALTH PLACE LTD

September 2021

WHO ARE WE?

Health Place exists to connect you with the most appropriate, safe and good quality support and advice, so that you can achieve your most important goals.

To do this, we collect data from you, always with your permission, about your needs and priorities and we then match you with data we hold on a huge variety of support and advice resources.

In short, Health Place works for you. The thousands of organisations who list their support services on Health Place work for you too. Your data remains owned by you and we use it on your behalf.

Health Place is both a “data controller” and “data processor” in respect of the information we hold about you. This means that we are responsible and accountable for how we use your personal information to help you achieve your goals.

OUR DATA PROTECTION OFFICER

Our Data Protection Officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws. If you have any concerns or questions about our use of your personal information, you can contact our Data Protection Officer by writing to Matthew Pike, Broughton House, 34 Hillmorton Road, Rugby, CV22 5AA.

THE INFORMATION WE PROCESS ABOUT YOU

We collect information about you in order to give you access to the most appropriate advice and support.

The types of personal data we may collect and process about you include:

Your name, age, support preferences and relevant medical or other issues that you are experiencing.

We will also ask for **your postcode, details of the GP practice where you are registered and your contact details;**

For users who share their email address, we may ask follow-up questions that include: **whether you have accessed support (or not) and your experience and rating of that support, the progress you have made with achieving goals and more specific actions to achieve these goals, plus optional brief questionnaires on different subjects.**

The only mandatory field that you have to fill in is the name of the place or the post code where you live. All other fields are optional, but the more data you add, the better the support we can offer.

HOW AND WHY WE PROCESS YOUR PERSONAL INFORMATION

In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. There are a variety of different lawful bases for using personal information which are set out in the data protection laws.

We have set out below the different purposes for which we collect and use your personal information, along with the lawful bases we rely on to do so.

Why we use your information	Our lawful basis for using your information
Giving you information about how to deal with common problems	Official authority: It is necessary for the performance of a task carried out in the public interest or in the exercise of our official authority. Health: It is necessary for the purposes of medical diagnosis, the provision of health or social care or
Advice based on what you tell us about yourself	
Recommendations of different support services based on	

<p>information that you share about your needs, goals and preferences.</p> <p>Keeping a record of the advice and recommendations that we have given you.</p> <p>If you would like assistance, taking your contact details so we can put an appropriate service in touch with you.</p> <p>Gathering information on the things people are worried about, the support people have told us they need, plus what services they have accessed and their feedback on the quality of this experience, so Health Place can recommend more appropriate support in the future and support service providers can try to deliver the right level of services in your locality.</p>	<p>treatment, or the management of health and social care services</p> <p>Public interest: It is necessary in the interest of public health.</p>
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STORING YOUR INFORMATION AND DELETING IT

This information will be kept on a computer. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy, which is available from our Data Protection Officer, whose contact details are above.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

KEEPING YOUR INFORMATION CONFIDENTIAL

Health Place is committed to protecting your privacy; we will only use

information collected lawfully in accordance with the General Data Protection Regulation 2016 (“GDPR”) and undertake not to use any information we may hold about you for any purpose incompatible with that for which it was collected, unless we have obtained your consent or where it is required by law.

All of our staff are required to protect your information, inform you of how your information will be used and allow you to decide if and how your information can be shared unless there is a legal exemption.

We ensure that our partner agencies handle our information under strict conditions and in line with the law. All staff have contractual obligations of confidentiality, enforceable through disciplinary procedures. Staff with access to patient identifiable information have received appropriate on-going training to ensure they are aware of their responsibilities and staff are granted access to personal data on a need-to-know basis only.

Data collected will not be sent to countries where the laws do not protect your privacy to the same extent as the law in the UK.

THE SOURCE OF YOUR INFORMATION

In order for the Health Place to perform its functions outlined above, we collect information about you directly from you using the Health Place support system.

SHARING YOUR INFORMATION

If you have authorised us to do so, we will share your information with providers of health, care and support services. We will not transfer your data outside of the EU.

YOUR RIGHTS

Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information in certain circumstances. This

enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information if we are relying on a legitimate interest (or those of a third party) or public interest/official authority as our lawful basis for processing and there is something about your particular situation which leads you to object to processing on this ground. You also have the right to object if we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party in certain circumstances.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer using the contact details above.

YOUR RIGHT TO WITHDRAW CONSENT

At any time you have the right to withdraw consent in the limited circumstances where we are relying on your consent to process your data for a specific purpose. You also have the right to object to our sharing of your personal information as part of the “Common Law Duty of Confidence”. The possible consequences will be fully explained to you and could include delays in receiving the support service you have told us you need.

If you have any questions or concerns regarding the information we hold on you or the use of your information, please contact us: Matthew Pike, Broughton House, 34 Hillmorton Road, Rugby, CV22 5AA.

RIGHT TO COMPLAIN TO THE ICO

For independent advice about data protection, privacy and data-sharing issues, or to make a complaint, you can contact the Information Commissioner

at: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Phone: 08456
30 60 60 or 01625 54 57 45 Fax: 01625 524 510 Website: www.ico.gov.uk