

PRIVACY POLICY

As a data processor, Acea Health Ltd./Flynotes (the company) manage both personal data and special category personal data (sensitive) on behalf of any data controllers that are under contract with the company. This personal and special category data is hosted within Amazon Web Services (AWS) in Dublin, with the data back up on servers in London. For detail on AWS privacy follow this link: <https://aws.amazon.com/privacy/>.

In addition to the above, statistical data will be collected in order to improve services provided to you. This includes information such as when a consent form was accessed by a patient and the time taken to read these documents.

WHAT IS PERSONAL OR SPECIAL CATEGORY DATA?

Personal data is information about an identifiable living person such as name, address, telephone number, date of birth, NHS Number, IP address and information about that person held in records. Records can be in different formats e.g. written correspondence, emails, photographs, audio recordings and video recordings.

Information classed as special category (sensitive) personal data, can include details of ethnic origin, religious beliefs, sexual orientation, trade union membership, health data, biometric data and genetic data.

HOW WE MANAGE PERSONAL DATA?

We process personal data to fulfil our obligations under contract with you, this is the legal basis for which personal data is managed under the General Data Protection Regulations (GDPR). As a company we have accountability to ensure that this information is processed within the relevant data privacy law, which is summarised in the following 6 principles of GDPR:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity, confidentiality and availability

A Data Protection Impact Assessment has been undertaken on Flynotes and MyFTC to ensure that personal and special category data is being managed within the law.

WHAT INFORMATION WILL BE PROCESSED?

The types of Information that will be processed include:

- healthcare data entered directly into Flynotes and or MyFTC
- healthcare data which has been transferred from external clinical systems into Flynotes and or MyFTC
- consent choices within Flynotes
- user data including name, GMC or GDC number, role and contact details
- audit data in relation to users and patient level access to Flynotes and/or MyFTC
- statistical data relating to when patients access their documents and the time taken when viewing these documents
- practice data including ventilation data within MyFTC
- treatment data within MyFTC

DATA SHARING AND AMAZON WEB SERVICES HOSTING OF DATA

The personal and special category data that is entered into Flynotes and/or MyFTC is hosted securely by Amazon Web Services (AWS). This is data held 'in the cloud'. This data is not shared with any party outside of the data controller.

Flynotes and/or MyFTC and AWS act as data processors managing data on instruction from the data controller. In addition to the above, data may be shared with the Police or other national security agencies where it is necessary and proportionate to support the prevention, investigation and detection of crime.

Anonymised aggregated data from MyFTC will from time to time be shared with our third party partners for the purpose of optimising and improving the services of MyFTC.

HOW LONG DO WE KEEP DATA?

We keep your information in accordance with timescales set out in the Records Management Code of Practice for Health and Social Care. Personal data that does not have a national retention schedule in the Code of Practice is managed for as long as is necessary to fulfil the purpose of obtaining it or if we are required to keep it by law, following this the data will be securely destroyed.

Data can be rectified or erased if necessary (within appropriate legal boundaries) by you as the data controller.

CAN A PATIENT OPT OUT OF PROCESSING?

If a patient wishes to opt out of the service provided by Flynotes or MyFTC, please ensure that, as a data controller, you are respecting their consent choices. There are no automated decisions made within Flynotes or MyFTC.

HOW CAN A REQUEST FOR INFORMATION BE MADE?

Flynotes and/or MyFTC enables you, as a data controller, to provide a copy of any personal and special category data directly to the relevant patient. This is in a format which can easily be shared if necessary.

If you have any queries around how information is managed or GDPR, please contact our Data Protection Officer: louise@flynotes.co.uk