

THE DUBLIN WELL WOMAN CENTRE Policy Document

Subject: Privacy Statement for Patients
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This privacy notice sets out the privacy practices of The Dublin Well Woman Centre ('Well Woman') regarding personal data that we may collect from or about you arising from your relationship with us as a patient.

1 General Statement

Well Woman respects your rights to the privacy of your personal data. We will not collect your personal data without your knowledge. Where we do collect personal data, we will only do so where we have a lawful basis upon which to collect and process personal data.

We will provide you with information as to what personal data is being collected and the purposes for which it is being collected. We will also inform you as to how you can access, update or correct such information, for how long we will retain such information, how it is stored and what to do if you wish to have it erased (subject to legal requirements).

If your personal data is shared with third parties, we will inform you of the identity of those third parties, eg hospital referrals, private referrals, laboratories etc. Any personal information which you provide to Well Woman will be treated strictly in accordance with applicable data protection legislation, including the General Data Protection Regulation (GDPR).

Any changes to this Privacy Notice will be notified to you by email.

2 The purposes for which we may collect your personal data

Where we collect personal data, we will do so either with your express **consent** or to protect your **vital interests** or to comply with our **legal requirements** and/or to pursue the **legitimate interests** of Well Woman, provided that the fundamental rights and interests of data subjects do not override our legitimate interests.

Some of the above lawful grounds of collecting and processing personal data will overlap and there may be several grounds which justify our use of personal data collected from you.

Legitimate interests of Well Woman may include processing personal data for carefully considered and specific purposes which are in our interests and enable us to enhance the services which we provide to patients like you.

Where we process sensitive personal data, such as your health data, we shall do so on the basis that the processing of health data is **necessary for the provision of health care or treatment** and that such data is processed under the responsibility of our medical practitioners, who are subject to professional secrecy obligations.

We will only collect and use your personal data for the purposes explained here and not for other purposes.

We may collect, process and share, within Well Woman, personal data collected from you for some or all of the purposes including but not limited to:

- providing, supporting and improving our services to you, including communicating to you test results, making appointments, preparing referrals to other medical service providers

- creating and maintaining a database of patient contacts details for the purpose of marketing new services to patients or asking patients to complete our annual Patient Satisfaction survey.
- managing our relationship with you
- identifying and preventing fraud and to comply with anti-money laundering legislation (where applicable)
- alerting you to service offerings which may be of interest to you
- determining the effectiveness of marketing campaigns and advertising
- for other legitimate business purposes

3 The type of information we may collect from you

The type of personal data which we may collect from you may include:

- your name
- your age
- your mobile phone and email contact details
- your occupation
- your address
- your appointments record
- your health records, treatments and medications
- your test results
- how you heard about us

4 How we will collect your personal data

We will collect, store and use personal data about you by the following means:

- Via our Patient Registration Form
- Identifying and printing repeat prescriptions for patients. These are then reviewed and signed by the clinic doctor.
- Generating a sickness certificate for the patient. This is then checked and signed by the clinic doctor.
- Typing referral letters to hospital consultants or allied health professionals such as physiotherapists, occupational therapists, psychologists and dieticians.
- Opening letters from hospitals and consultants. The letters could be appended to a patient's paper file or scanned into their electronic patient record.
- Scanning clinical letters, radiology reports and any other documents not available in electronic format.
- Downloading laboratory results and performing integration of these results into the electronic patient record.
- Photocopying or printing documents for referral to consultants, attendance at an antenatal clinic or when a patient is changing doctor.
- Checking for a patient if a hospital or consultant letter is back or if a laboratory or radiology result is back, in order to schedule a conversation with the GP.
- When a patient makes contact with a practice, checking if they are due for any preventative services, such as vaccination, contraceptive pill check, cervical smear test, etc.
- Handling, printing, photocopying and postage of medico legal and life assurance reports, and of associated documents.
- Sending and receiving information via Healthmail, secure clinical email.
- Other activities related to the support of medical care appropriate for practice support staff.
- Through your communicating or corresponding with us by phone, email, in person, by means of our online booking form via our website or otherwise;
- By you subscribing to any of our marketing newsletters or mailing lists;

5 Direct Marketing Purposes

Dublin Well Woman publishes on occasion, an e-bulletin with women's health updates. You may opt in to receive this via our website. We also circulate a once yearly patient satisfaction survey which we use to improve the quality of services provided to you. You may opt out from receiving either of these by contacting the clinic you attended directly.

6 Sharing of your Personal Data

We may share your personal data with the following third parties:

- professional advisors, agents or contractors of Well Woman in connection with the services that these individuals or entities perform (where advisors, agents, contractor or partners have entered into contractual obligations with Well Woman which require compliance with security and privacy obligations);
- with our professional indemnity insurers for the purpose of defending any claims; or
- with government agencies, authorities or regulators, law enforcement and similar authorities to comply with our legal obligations and to enable our clients to comply with their legal obligations.

We will not transfer your personal data outside of the European Economic Area to third parties.

7 Your Rights

You are entitled to obtain a copy of any personal data we hold about you and to request that we correct inaccuracies in such data without undue delay.

You also have the right to complete any incomplete personal data about you that we hold.

You have the right to request that we delete any personal data about you without undue delay and/or request that we restrict the manner in which we process your personal data. However, as a primary care service the Dublin Well Woman Centre has a requirement under Medical Council rules to keep medical records and also has a right to defend medico-legal claims, under Article 23.1(g) GDPR. The right to erasure of medical records is not an absolute right and restrictions may apply.

If you wish to avail of any of the above rights, please contact us at: info@wellwomancentre.ie

Your request will be dealt with as soon as possible but within 1 month from the date you make a request to us.

8 Retention of your data

We will not retain your personal data longer than is reasonably necessary for the purposes set out above, which will generally correspond to the period of time during which you have a relationship with Well Woman.

We may retain personal data for an additional period of time if this is required by applicable law or regulation, in connection with legal or other proceedings (in most cases for a minimum of 8 years after your last attendance at Well Woman and/or to satisfy any audit requirements imposed on us by the Health Service Executive (HSE) (in most cases for a period of 8 years after a service level agreement with HSE has been completed).

9 Data Processors

Any third party processors we use to process your personal data will do so only on the basis of documented instructions from us. Our third party data processors are obliged to notify us in the event of a data security breach in relation to any personal data processed by them on our behalf.

Our third party data processors are subject to obligations of confidentiality regarding your personal data. They are not permitted to engage sub-processors without our prior consent and imposing the same obligations of confidentiality regarding your personal data.

In addition, they are obliged to return or delete to us all personal data held by them on our behalf to the extent that any such personal data does not reside on electronic systems owned by a Well Woman company.

10 Data Security

Our systems are regularly tested and assessed to validate that the technical and organisational measures we have put in place ensure the security of the processing and storage of your personal data.

Your personal data will be stored on secure servers controlled by Well Woman and which are located within the EU and which will use strict procedures and security features designed to prevent unauthorised access. All clinical and other data held on our servers is encrypted. As the transmission of information via the internet is not completely secure, we cannot guarantee the security of your personal data being transmitted to our systems.

Our online Booking Form information is held securely on the website, but will be regularly purged from the online repository, and an offline copy will be stored securely on the Well Woman internal server, which is encrypted.

In the event of a data security breach and it appears likely that there is a risk that your personal data may be accessed or compromised, we will report this to the relevant data supervisory authority, the Irish Data Protection Commissioner, **within 72 hours** of becoming aware of such breach.

We shall also inform you without undue delay of any such data security breach if it is likely to result in a high risk to your privacy rights and freedoms.

11 Privacy Officer

Well Woman has appointed a Privacy Officer to address any concerns or queries with regard to the handling of personal data by Well Woman. Please email: info@wellwomancentre.ie in the event that you wish to contact us in relation to any matter concerning the processing of your personal data.

12 Complaints

You have the right to raise queries and/or lodge a formal complaint with the supervisory authority regarding our handling of your personal data.

The supervisory authority to which any such complaint should be addressed is the Irish Data Protection Commissioner (email: info@dataprotection.ie) and the way to raise queries and/or lodge a formal complaint can be found via <https://www.dataprotection.ie/docs/Contact-us/b/11.htm>