

## Dyfi Valley Health Privacy Policy

### General Data Protection Regulation (GDPR) 2018.

#### 1.0 Introduction

The General Data Protection Regulation (GDPR) comes in to force on 25 May 2018, superseding the Data Protection Act (1998).

Under the terms of the new GDPR, a privacy notice is required to explain to our patients what personal data is held about them, how it is collected, processed and who has access to it.

All businesses who collect data about people need to comply with the GDPR European legislation and will need to continue to adhere to it once the U.K. leaves the E.U.

For a full background on GDPR see the GDPR Website here. (<https://www.eugdpr.org/>)

#### 2.0 Data Controller & Data Protection Officer

<b>Names of Data Controller</b>	Dyfi Valley Health
<b>Contact Details</b>	<p>Dyfi Valley Health Glantwymyn Health Centre Cemmaes Road Machynlleth Powys SY20 8LB Phone: 01650 511 227</p> <p>Dyfi Valley Health Machynlleth Health Centre Forge Road Machynlleth Powys SY20 8EQ Phone: 01654 702 224</p> <p>Email: <a href="mailto:contact@DyfiValleyHealth.org">contact@DyfiValleyHealth.org</a> Website: <a href="http://DyfiValleyhealth.org">http://DyfiValleyhealth.org</a></p>
<b>Data Protection Officer</b>	Mr. James Bradbury-Willis
<b>Contact Details</b>	<p>The Digital Musketeer The Old Library, Literary Institute Seaview Terrace, Aberdovey Gwynedd, LL35 0LL Phone: 01654 767 737</p> <p>Email: <a href="mailto:contact@theDigitalMusketeer.com">contact@theDigitalMusketeer.com</a> Website: <a href="http://theDigitalMusketeer.com">http://theDigitalMusketeer.com</a></p>

### 3.0 Your Data

#### 3.1 How we Collect Your Data

We collect your data when you willingly provide us with the required personal information whilst registering to become a patient at Dyfi Valley Health, via the Registration Questionnaire (14052018\_v1) and NHS Wales Registration Form.

##### 3.1.1 Information Collected by Other Resources

By registering with the practice in Section 3.1, you consent to your medical history from your previous practice(s) being sent to the practice. The provision of this information is essential in order that we can deliver personal care and medical treatment.

We often obtain information from hospitals, pharmacies and other medical practitioners to whom you will already have submitted your personal data.

#### 3.2 What Data we Collect

Data Collected		
Name(s)		If you are a carer or cared for
Date of Birth		Have a disability
Address		Your ability to access the surgery
Phone Number(s)		If you were in the armed forces
Email Address		Family Medical History
Your Medical History		Lifestyle (smoking / drinking)
Chronic Health Concerns		Ethnic Group

#### 3.3 Who Has Access to Your Data

Only specific, trained and required members of the Dyfi Valley Health clinical and non-clinical team has access to your data. Not all members of the team have access to all your data – only the clinical team does so. On occasions we may need to share your data in order to provide you with the best medical treatment – see Section 3.5.

We undertake at all times to protect your personal data in a manner which is consistent with the practice team's duty of confidentiality and the requirements of the General Data Protection Regulation. We will also take all reasonable measures to protect your personal data stored in paper files and on our electronic system.

#### 3.4 How we Use Your Data

How Data is Used	Non-Clinical Team	Clinical Team
	Making Appointments Generate Prescriptions Electronically File Medical Records Provide Requested Test Results Send Treatment Reminders Send Clinic Reminders	To Provide You with Care & Medical Treatment

#### 3.5 Sharing Your Data

We will keep information about you confidential and will only disclose any information with third parties with your permission, if it is in your interests to do so and when we are sure that the party with whom we are sharing information is a medical practitioner with whom you have already shared personal information. For example:

- Giving contact information to a physiotherapist or hospital which wishes to contact you regarding an appointment.
- With your written or verbal consent, we will share information about you with a carer.
- With express consent, Information shared with solicitors and insurance companies.
- With production of a court order, Information will be shared with legal agencies and the police

For more examples on how we may share your information, please speak to one of our non-clinical team who can advise accordingly and specifically.

### 3.6 How Long do we Hold Your Data

We will keep your paper and electronic (hospital/clinic) records as long as you are a patient at the practice.

When you end your time with the Practice, these records will be returned to Shared Services and follow *NHS* guidelines.

The practice will archive information held on its clinical system relating to consultations, immunisations, medical history and prescribing.

### 3.7 Location of Your Data

Your data is securely stored and located on our computer systems, which are managed by *NHS Wales Information Service*. For specific information on how your data is stored electronically contact them by clicking here. (<http://www.wales.nhs.uk/nwis/page/52504>)

We also store, when necessary, physical paper copies of your medical records. These records are held in a secure location that follows relevant legislative guidelines.

## 4.0 Patient (Data Subject) Rights

If you would like to invoke any of the following data subject rights, please write to The Practice Manager, Glantwymyn Health Centre, Cemmaes Road, Machynlleth, Powys, SY20 8LB.

### 4.1 Right to be Informed

This Privacy Policy informs you of your rights. The latest version will be found on the Dyfi Valley Health Website and within the surgery for your access. New versions will be updated online and made available upon request.

### 4.2 Right to Access Your Data

GDPR 2018 grants you the right to access particular personal data which we hold about you. This is referred to as a subject access request. We will respond promptly and at least within **one calendar month** from the date of receiving the request and all necessary information in writing from you.

### 4.3 Right to Rectify

If considered appropriate, a retrospective entry can be made by a clinician if you have concerns regarding the accuracy of your clinical record.

You will also have the right to have incomplete personal data completed, if necessary by providing a signed and dated supplementary statement. We will respond to the request for rectification at least within **one calendar month**.

#### 4.4 Right to Erase

You have the right to request erasure of personal information concerning you **if this is no longer relevant**. We can not delete data which may compromise your medical care in the current or future.

#### 4.5 Right of Data Portability

We can respond to a request from you for the supply of your personal information in an electronic format, which you then have the right to transmit elsewhere.

#### 4.6 Rights to Automation

Patients have the right not to be subject to a decision based on automated processing. Patients have the right to (a) obtain human intervention, (b) express their point of view, and (c) obtain an explanation of the decision and challenge it.

### 5.0 Questions, Queries & Complaints

If you have any questions or queries which this Privacy Policy has not addressed, or if you have any concerns about how we use the personal information we hold, please write to:

Dyfi Valley Health  
Machynlleth Health Centre  
Forge Road  
Machynlleth  
Powys  
SY20 8EQ

On behalf of Drs Shaw, Hyde and Bradbury-Willis, many thanks.

June 2018

James Bradbury-Willis (DPO)