

SPIRE HEALTHCARE
GP PRIVACY NOTICE

Executive summary

1. As custodian of your personal data, we must treat that information in accordance with all applicable law and guidance. This Privacy Notice provides you with a detailed overview of how we will manage your data, from the point at which it is gathered and onwards. We will use that information for a variety of purposes. This Privacy Notice will give you all the details you need on how we use your information, and how we will comply with the law in doing so.
2. In addition, you have a number of rights as a data subject. You can, for instance, seek access to your personal information, object to us using your information in particular ways and request rectification of any information which is inaccurate or deletion of information which is no longer required (subject to certain exceptions). This Privacy Notice also sets out your rights in respect of your personal information, and how to exercise them.
3. For ease of reference, this Privacy Notice is broken into separate sections below with headings which will help you to navigate through the document. We are also open to improvement, and if you have any feedback on this Privacy Notice then do please feel free to contact our Data Protection Officer with your thoughts.

Introduction

1. In this Privacy Notice we use "**we**" or "**us**" or "**our**" or "**Spire**" to refer to the Spire company who is processing your personal information.
2. This Privacy Notice sets out details of how we may collect and use your personal data, which is primarily in order to send you information in relation to new products and services and invite you to educational events. It applies to all GPs to whom we regularly send such information and invitations.
3. Please take your time to read this Privacy Notice carefully. This Privacy Notice does not form part of any contract between you and Spire to provide services. We may update this Privacy Notice at any time. We may also notify you in other ways from time to time about the processing of your personal

information.

4. This Privacy Notice will be issued on 22 May 2018. It will not, however, be effective until 25 May 2018 when the General Data Protection Regulation comes into force.

About us

5. If the correspondence you receive from us is from Spire Healthcare Group plc, the relevant data controller for your personal information is Spire Healthcare Group plc, 3 Dorset Rise, London, EC4Y 8EN, Company No. 09084066.
6. If the correspondence you receive from us is from Spire Healthcare Limited, the relevant data controller for your personal information is Spire Healthcare Limited, 3 Dorset Rise, London, EC4Y 8EN, Company No. 01522532.
7. If the correspondence you receive from us is from Montefiore House Limited, the relevant data controller for your personal information is Montefiore House Limited, 3 Dorset Rise, London, EC4Y 8EN, Company No. 07414715.

Our Data Protection Officer and how to contact us

8. Spire has appointed Jayne O'Hara as the Spire Group data protection officer ("DPO"). The DPO helps ensure that the Spire group of companies comply with data protection law. Our DPO has responsibility for data protection compliance in respect of the companies set out above.
9. The DPO can be contacted by:
 - a) Telephone: 020 7427 9071;
 - b) Email: dataprotection@spirehealthcare.com; or
 - c) Post: Data Protection Officer, Spire Healthcare, 3 Dorset Rise, London, EC4Y 8EN
10. If you would like further information about any of the matters in this Privacy Notice or have any other questions about how we collect, store or use your personal information, please contact the DPO using the details above.

What personal information do we collect?

11. We will collect, use and store your personal data for a limited set of reasons in order to provide you with information relating to Spire products and services and invite you to educational events with a

view to improving the professional relationship between us. For the avoidance of doubt, we are not sending you marketing materials as we are not inviting you to buy anything or prefer us as a private healthcare provider. It is simply to keep you updated in relationship to the latest developments at your local Spire hospital, where some of your patients may have received treatment in the past, are about to receive treatment or are currently receiving our services. We have set out below the main categories of personal data which we collect, which includes:

- personal contact information (including your name, personal address, personal telephone number(s) and personal email address)
- business contact information (including email address, practice address and telephone number)
- job title
- personal data which you otherwise voluntarily provide

12. The list set out above is not exhaustive, and there may be other personal data which we collect, store and use in the context of our relationship. We will update this Privacy Notice from time to time to reflect any notable changes in the categories of personal data which we process.

13. Some of the personal data which we process will be collected directly from you, but in other circumstances it may be provided by third parties, particularly the Binleys database which is provided by Wilmington Healthcare Ltd and is a subscription based service providing databases of professional health contacts and NHS personnel. When we obtain your personal data under licence from organisations such as Wilmington Healthcare we do so on the understanding that they have sought your consent to be included on their database or have advised you that your data is being shared with organisations such as Spire, and regularly check with you to see if you are still happy for your details to be included.

Special Categories of Personal Information

14. Certain categories of data are considered by the law to be "special categories of personal data" and are subject to additional safeguards. We do not process any such categories of personal data in connection with the relationship between us.

How do we use your personal data?

15. We use your personal data for very specific purposes in order to provide you with information and invite you to educational events. In particular, we will send information sheets to you about new products and services which we may launch from time-to-time. We will also invite you to events at which new products and services are discussed. We use your personal data in this regard in pursuit of our legitimate organisational interests.

16. Again, this list is not exhaustive and we may undertake additional processing of personal data in line with the purposes set out above. We will update this Privacy Notice from time to time to reflect any notable changes in the purposes for which we process your personal data.

When do we share your personal data?

17. Other than in advance of sponsored events where your personal data (usually name and email address) may be shared with the sponsor, we will not share your personal data with any third parties, unless we are under a legal or regulatory obligation to do so. Furthermore, we (or third parties acting on our behalf) will not store or process information that we collect about you in countries outside the European Economic Area.

18. If you would like further information regarding the steps we take to safeguard your personal information, please contact the DPO using the details set out above.

How long do we keep personal information for?

19. We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with our legal and regulatory obligations. Under some circumstances we may anonymise your personal data so that it cannot be used to identify you, and is therefore not personal data. We reserve the right to retain and use such anonymous data for any legitimate business purpose without further notice to you.

20. We will typically retain your data, subject to any exceptional circumstances and/or to comply with particular laws or regulations, for 6 years.

21. If you would like further information regarding the periods for which your personal information will be stored, please contact the DPO for further details.

Your rights

22. Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out above.

Your rights include:

The right to access your personal information

23. You are usually entitled to a copy of the personal information we hold about you and details about

how we use it.

24. Your information will usually be provided to you in writing, unless otherwise requested. If you have made the request electronically (eg by email) the information will be provided to you by electronic means where possible.
25. Please note that in some cases we may not be able to fully comply with your request, for example if your request involves the personal data of another person and it would not be fair to that person to provide it to you. Such requests have to be considered on a case-by-case basis.

The right to rectification

26. We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.

The right to erasure (also known as the right to be forgotten)

27. In some circumstances, you have the right to request that we delete the personal information we hold about you. However, there are exceptions to this right and in certain circumstances we can refuse to delete the information in question. In particular, for example, we do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercise or defending legal claims.

The right to restriction of processing

28. In some circumstances, we must "pause" our use of your personal data if you ask us to. We do not have to comply with all requests to restrict our use of your personal information. In particular, for example, we do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercise or defending legal claims.

The right to data portability

29. In some circumstances, we must transfer personal information that you have provided to us to you or (if this is technically feasible) another individual/ organisation of your choice. The information must be transferred in an electronic format.

The right not to be subject to automatic decisions (ie decisions that are made about you by computer alone)

30. You have the right not to be subject to automatic decisions at any time and we must comply with your request. Such decision may include you being sent invitations based on profiling you practice postcode. We have put in place appropriate measures to safeguard any information subject to profiling.
31. If you have been subject to an automated decision and do not agree with the outcome, you can challenge the decision and contact the DPO.

The right to complain to the Information Commissioner's Office

32. You can complain to the Information Commissioner's Office (ICO) if you are unhappy with the way that we have dealt with a request from you to exercise any of these rights, or if you think we have not complied with our legal obligations.
33. More information can be found on the Information Commissioner's Office website:
<https://ico.org.uk/>
34. Making a complaint will not affect any other legal rights or remedies that you have.

Your duty to inform us of any changes

35. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Updates to this Privacy Notice

36. We may update this Privacy Notice from time to time to ensure that it remains accurate. In the event that these changes result in any material difference to the manner in which we process your personal data then we will provide you with an updated copy of the Privacy Notice.
37. This Privacy Notice was last updated on: **22 May 2018**.