

# Premier Vascular Patient Privacy Notice

## Executive summary

1. Premier Vascular is a custodian of personal information relating to your medical treatment, and must only use that information in accordance with all applicable law and guidance. This Privacy Notice provides you with a detailed overview of how this data will be managed from the point at which it is gathered and onwards, and how that complies with the law. Premier Vascular will use your personal information for a variety of purposes including, but not limited to, providing you with care and treatment, sharing it with other medical professionals and research/audit programmes.
2. In addition, you have a number of rights as a data subject. You can, for instance, seek access to your medical information, object to Premier Vascular using your information in particular ways, 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 Notice is divided into separate sections below with headings which will help you to navigate through the document.

## Introduction

This Privacy Notice sets out details of the information that Premier Vascular (including medical secretaries and staff) may collect from you and how that information may be used. Please take your time to read this Privacy Notice carefully.

## Contact Premier Vascular

In the event that you have any queries, comments or concerns in respect of the manner in which Premier Vascular used, or potentially will use, your personal information then you should contact Premier Vascular directly to discuss further. You may telephone 01217692646 or email [reception@premiervascular.co.uk](mailto:reception@premiervascular.co.uk)

## Your personal data

1. Premier Vascular is a Data Controller in respect of your personal information which is held about you. This will mainly relate to your medical treatment, but will be likely to also include other information such as financial data in relation to billing. Premier Vascular must comply with the data protection legislation and relevant guidance when handling your personal information, and so must any medical secretary who assists Premier Vascular in an administrative capacity. Your personal data may include any images taken in relation to your treatment which must not only be managed in accordance with the law, this Privacy Notice but also all applicable professional standards including guidance from the General Medical Council and British

Medical Association.

2. Premier Vascular will provide your treatment from an Independent Private Hospital or Clinic and, in due course, it may be necessary for the Independent Private Hospital or Clinic to also process your personal data. Premier Vascular will do so in accordance with the law, the principles of this Privacy Notice and to the extent that it is necessary to do so. This could be where the Independent Private Hospital or Clinic needs to arrange other healthcare services as part of your treatment, such as nursing or dietician advice, or support other aspects of the treatment which Premier Vascular provides to you. In that case, the Independent Private Hospital or Clinic will become a joint Data Controller in respect of your personal information and you will be provided with a copy of their Privacy Notice which sets out how they will manage that information.
3. Your personal information will be handled in accordance with the principles set out within this Privacy Notice. This means that whenever Premier Vascular use your personal data, Premier Vascular will only do so as set out in this Privacy Notice. From time to time, Premier Vascular may process your personal information at a non-independent Private Hospital or Clinic site (medical or non-medical), as may our medical secretarial team.

#### **What personal information does Premier Vascular collect and use from patients?**

4. Premier Vascular will use "special categories of personal information" (previously known as "sensitive personal data") about you, such as information relating to your physical and mental health.
5. If you provide personal information to Premier Vascular about other individuals (including medical or financial information) you should inform the individual about the contents of this Privacy Notice. Premier Vascular will also process such information in accordance with this Privacy Notice.
6. In addition, you should note that in the event you amend data which Premier Vascular already holds about you (for instance by amending a pre-populated form) then Premier Vascular will update the systems to reflect the amendments. The systems will continue to store historical data.

#### **Personal information**

7. As a patient of Premier Vascular, the personal information Premier Vascular holds about you may include the following:
  - a) Name
  - b) Contact details, such as postal address, email address and telephone number (including mobile number)
  - c) Financial information, such as credit card details used to pay us and insurance policy details
  - d) Occupation

- e) Emergency contact details, including next of kin
- f) Background referral details

### **Special categories personal information**

8. As one of our patients, Premier Vascular will hold information relating to your medical treatment which is known as a special category of personal data under the law, meaning that it must be handled even more sensitively. This may include the following:
  - a) Details of your current or former physical or mental health, including information about any healthcare you have received from other healthcare providers such as GPs, dentists or hospitals (private and/or NHS), which may include details of clinic and hospital visits, as well as medicines administered. Premier Vascular will provide further details below on the manner in which Premier Vascular handle such information.
  - b) Details of services you have received from Premier Vascular
  - c) Details of your nationality, race and/or ethnicity
  - d) Details of your religion
  - e) Details of any genetic data or biometric data relating to you
  - f) Data concerning your sex life and/or sexual orientation
10. The confidentiality of your medical information is important to Premier Vascular, and Premier Vascular make every effort to prevent unauthorised access to and use of information relating to your current or former physical and mental health (or indeed any of your personal information more generally). In doing so, Premier Vascular will comply with UK data protection law, including the Data Protection Act 2018 and all applicable medical confidentiality guidelines issued by professional bodies including, but not limited to, the General Medical Council and the Nursing and Midwifery Council.
11. Since 25 May 2018, the current Data Protection Act has been replaced by the EU General Data Protection Regulation (GDPR) and a new Data Protection Act. All uses of your information will comply with the GDPR and the new Data Protection Act.

### **How does Premier Vascular collect your information?**

12. Premier Vascular may collect personal information from a number of different sources including, but not limited to:
  - a) GPs
  - b) Dentists
  - c) Other hospitals, both NHS and private (including Spire/other independent provider)
  - d) Mental health providers
  - e) Commissioners of healthcare services
  - f) Other clinicians (including their medical secretaries)

### **Directly from you**

13. Information may be collected directly from you when:
- a) You enter into a contract with Premier Vascular or Independent Private Hospital or Clinic for the provision of healthcare services
  - b) You use those services
  - c) You complete enquiry forms on the Independent Private Hospital or Clinic website
  - d) You submit a query to Premier Vascular including by email or by social media
  - e) You correspond with Premier Vascular by letter, email, telephone (incoming and outgoing) calls from/to patients may be recorded or social media

### **From other healthcare organisations**

14. Premier Vascular patients will usually receive healthcare from other organisations, and so in order to provide you with the best treatment possible Premier Vascular may have to collect personal information about you from them. These may include:
- a) Medical records from your GP
  - b) Medical records from other clinicians (including their medical secretaries)
  - c) Medical records from your dentist
  - d) Medical records from the NHS or any private healthcare organisation
15. Medical records include information about your diagnosis, clinic and hospital visits and medicines administered.

### **From third parties**

16. As detailed in the previous section, it is often necessary to seek information from other healthcare organisations. Premier Vascular may also collect information about you from third parties when:
- a) You are referred to Premier Vascular for the provision of services including healthcare services
  - b) Premier Vascular liaises with your current or former employer, health professional or other treatment or benefit provider
  - c) Premier Vascular liaises with your family
  - d) Premier Vascular liaises with your insurance policy provider
  - e) Premier Vascular deals with experts (including medical experts) and other service providers about services you have received or are receiving from Premier Vascular
  - f) Premier Vascular deals with NHS bodies about services you have received or are receiving from us
  - g) Premier Vascular liaises with credit reference agencies

- h) Premier Vascular liaises with debt collection agencies
- i) Premier Vascular liaises with Government agencies, including the Ministry of Defence, the Home Office and HMRC

### **How will Premier Vascular communicate with you?**

17. Premier Vascular may communicate with you in a range of ways, including by telephone, SMS, email, and/or post. If Premier Vascular contacts you using the telephone number(s) which you have provided (landline and/or mobile), and you are not available, which results in the call being directed to a voicemail and/or answering service, Premier Vascular may leave a voice message on your voicemail and/or answering service as appropriate, and will include only sufficient basic details to enable you to identify who the call is from, very limited detail as to the reason for the call and how to call Premier Vascular back.
18. However:
  - a) to ensure that Premier Vascular provides you with timely updates and reminders in relation to your healthcare (including basic administration information and appointment information), including reminders, Premier Vascular may communicate with you by SMS and/or unencrypted email (where you have provided Premier Vascular with your SMS or email address); in each case where you have expressed a preference in the patient registration form to be contacted by SMS and/or email.
  - b) to provide you with your medical information (including test results and other clinical updates) and/or invoicing information, Premier Vascular may communicate with you by email (which will be encrypted) where you have provided Premier Vascular with your email address and have expressed a preference in the patient registration form to be contacted by email. The first time Premier Vascular sends you any important encrypted email that Premier Vascular is not also sending by post or which requires action to be taken, Premier Vascular will endeavour to contact you separately to ensure that you are able to access the encrypted email you are sent.
19. Please note that, although providing your mobile number and email address and stating a preference to be communicated by a particular method will be taken as an affirmative confirmation that you are happy for us to contact you in that manner, Premier Vascular is not relying on your consent to process your personal data in order to correspond with you about your treatment. As set out further below, processing your personal data for those purposes is justified on the basis that it is necessary to provide you with healthcare service.

### **What are the purposes for which your information is used?**

20. Premier Vascular may 'process' your information for a number of different purposes, which is essentially the language used by the law to mean using your data. Each time Premier Vascular uses your data Premier Vascular must have a legal justification to do so. The particular justification will depend on the purpose of the proposed use of your data. When the information that we process is classed as a "special category of personal information", Premier Vascular

must have a specific additional legal justification in order to use it as proposed.

21. Generally, Premier Vascular will rely on the following legal justifications or 'grounds':
  - a) Taking steps at your request so that you can enter into a contract with Premier Vascular to receive healthcare services from us.
  - b) For the purposes of providing you with healthcare pursuant to a contract between you and Premier Vascular. Premier Vascular will rely on this for activities such as supporting your medical treatment or care and other benefits, supporting your nurse, carer or other healthcare professional and providing other services to you.
  - c) Premier Vascular has an appropriate business need to process your personal information and such business need does not cause harm to you. Premier Vascular will rely on this for activities such as quality assurance, maintaining business records, monitoring outcomes and responding to any complaints.
  - d) Premier Vascular has a legal or regulatory obligation to use such personal information.
  - e) Premier Vascular needs to use such personal information to establish, exercise or defend its legal rights.
  - f) You have provided your consent to Premier Vascular's use of your personal information.
22. Note that failure to provide your information further to a contractual requirement with Premier Vascular may mean that Premier Vascular is unable to set you up as a patient or facilitate the provision of your healthcare.
23. Premier Vascular will provide further detail on these grounds in the sections below.

### **Appropriate business needs**

24. One legal ground for processing personal data is where Premier Vascular do so in pursuit of legitimate interests and those interests are not overridden by your privacy rights. Where Premier Vascular refer to use for appropriate business needs, Premier Vascular are relying on this legal ground.

### **The right to object to other uses of your personal data**

25. You have a range of rights in respect of your personal data, as set out in detail in sections [67-88]. This includes the right to object to Premier Vascular using your personal information in a particular way (such as sharing that information with third parties), and Premier Vascular must stop using it in that way unless specific exceptions apply. This includes, for example, if it is necessary to defend a legal claim brought against Premier Vascular, or it is otherwise necessary for the purposes of your ongoing treatment. You will find details of Premier Vascular's legal grounds for each of our processing purposes below. Premier Vascular have set out individually those purposes for which Premier Vascular will use your personal information, and under each one Premier Vascular have set out the legal justifications, or grounds, which allow Premier Vascular to do so. You will note that Premier Vascular have set out a legal ground, as well as an 'additional' legal ground for special categories of personal information. This is because Premier

Vascular has to demonstrate additional legal grounds where using information which relates to a person's healthcare, as the majority of the times Premier Vascular will be the user of your personal information.

***Purpose 1: To set you up as a Premier Vascular patient, including carrying out fraud, credit, anti-money laundering and other regulatory checks***

26. As is common with most business, Premier Vascular have to carry out necessary checks in order for you to become a patient. These include standard background checks, which Premier Vascular cannot perform without using your personal information.
27. Legal ground: Taking the necessary steps so that you can enter into a contract with Premier Vascular for the delivery of healthcare.
28. Additional legal ground for special categories of personal information: The use is necessary for reasons of substantial public interest, and it is also in Premier Vascular's legitimate interests to do so.

***Purpose 2: To provide you with healthcare and related services***

29. Clearly, the reason you come to Premier Vascular is to provide you with healthcare, and so Premier Vascular have to use your personal information for that purpose.
30. Legal grounds:
  - a) Providing you with healthcare and related services
  - b) Fulfilling Premier Vascular's contract with you for the delivery of healthcare
31. Additional legal grounds for special categories of personal information:
  - a) Premier Vascular may need to use the data in order to provide healthcare services to you
  - b) The use is necessary to protect your vital interests where you are physically or legally incapable of giving consent

***Purpose 3: For account settlement purposes***

32. Premier Vascular will use your personal information in order to ensure that your account and billing is fully accurate and up-to-date.
33. Legal grounds:
  - a) Premier Vascular providing you healthcare and other related services
  - b) Premier Vascular fulfilling its contract with you for the delivery of healthcare
  - c) Premier Vascular having an appropriate business need to use your information which does not overly prejudice you
  - d) Your consent
34. Additional legal grounds for special categories of personal information:
  - a) Premier Vascular may need to use the data in order to provide healthcare services to you

- b) The use is necessary in order for Premier Vascular to establish, exercise or defend its legal rights
- c) Your consent

*Purpose 4: For medical audit/research purposes*

**Clinical audit**

- 35. Premier Vascular may process your personal data for the purposes of local clinical audit, i.e. an audit carried out by the Premier Vascular team for the purposes of assessing outcomes for patients and identifying improvements which could be made for the future. Premier Vascular is able to do so on the basis of Premier Vascular's legitimate interest and the public interest in statistical and scientific research, and with appropriate safeguards in place. You are, however, entitled to object to Premier Vascular using your personal data for this purpose, and as a result of which Premier Vascular would need to stop doing so. If you would like to raise such an objection then please contact Premier Vascular using the details provided on Page 1 of this notice.
- 36. Premier Vascular may also be asked to share information with UK registries for which ethical approval is not necessarily required but which form part of the National Clinical Audit Programme, hosted by NHS England and who provide a list of National Clinical Audit and Clinical Outcome Review Programmes and other quality improvement programmes which we should prioritise for participation. Premier Vascular may do so without your consent provided that the particular audit registry has received statutory approval, or where the information will be provided in a purely anonymous form, otherwise your consent will be needed and either Premier Vascular will seek this from you or the registry themselves will do so. The registry which Premier Vascular regularly shares data with is the National Vascular Registry.

**Medical research**

- 37. Premier Vascular may also be asked to participate in medical research and share data with ethically approved third party research organisations.
- 38. Premier Vascular will share your personal data only to the extent that it is necessary to do so in assisting research and as permitted by law. Some research projects will have received statutory approval such that consent may not be required in order to use your personal data. In those circumstances, your personal data will be shared on the basis that:

Legal grounds:

- a) Premier Vascular have a legitimate interest in helping with medical research and have put appropriate safeguards in place to protect your privacy

Additional legal grounds for special categories of personal information:

- b) The processing is necessary in the public interest for statistical and scientific research purposes

39. In the event that consent is required then either Premier Vascular will seek this from you, or the research agency will do so.

***Purpose 5: Communicating with you and resolving any queries or complaints that you might have,***

40. From time to time, patients may raise queries, or even complaints, with Premier Vascular and Independent Private Hospital or Clinic, and Premier Vascular take those communications very seriously. It is important that Premier Vascular are able to resolve such matters fully and properly and so Premier Vascular, as well as Independent Private Hospital or Clinic will need to use your personal information in order to do so.

41. Legal grounds:

- a) Providing you with healthcare and other related services
- b) Having an appropriate business need to use your information which does not overly prejudice you

42. Additional legal grounds for special categories of personal information:

- a) The use is necessary for the provision of healthcare or treatment pursuant to a contract with a health professional
- b) The use is necessary in order for Premier Vascular to establish, exercise or defend Premier Vascular's legal rights

***Purpose 6: Communicating with any other individual that you ask us to update about your care and updating other healthcare professionals about your care,***

43. In addition, other healthcare professionals or organisations may need to know about your treatment in order for them to provide you with safe and effective care, and so Premier Vascular may need to share your personal information with them. Further details on the third parties who may need access to your information is set out at section 55 below.

44. Legal grounds:

- a) Providing you with healthcare and other related services
- b) Premier Vascular have a legitimate interest in ensuring that other healthcare professionals who are routinely involved in your care have a full picture of your treatment

45. Additional legal ground for special categories of personal information:

- a) Premier Vascular need to use the data in order to provide healthcare services to you
- b) The use is necessary for reasons of substantial public interest under UK law
- c) The use is necessary in order for Premier Vascular to establish, exercise or defend its legal rights

46. Premier Vascular also participate in initiatives to monitor safety and quality, helping to ensure that patients are getting the best possible outcomes from their treatment and care. The Competition and Markets Authority Private Healthcare Market Investigation Order 2014

established the Private Healthcare Information Network (PHIN), as an organisation which will monitor outcomes of patients who receive private treatment. Under Article 21 of that Order, Premier Vascular is required to provide PHIN with information related to your treatment, including your NHS Number in England and Wales, CHI Number in Scotland or Health and Care Number in Northern Ireland), the nature of your procedure, whether there were any complications such as infection or the need for readmission/admission to a NHS facility and also the feedback you provided as part of any Patient Reported Outcome Measures (PROM) surveys. PHIN will use your information in order to share it with the NHS, and track whether you have received any follow-up treatment. Premier Vascular will only share this information with PHIN if you have provided your consent for Premier Vascular to do so.

47. The records that Premier Vascular share may contain personal and medical information about patients, including you. PHIN, like Premier Vascular, will apply the highest standards of confidentiality to personal information in accordance with data protection laws and the duty of confidentiality. Any information that is published by PHIN will always be in anonymised statistical form and will not be shared or analysed for any purpose other than those stated.

Further information about how PHIN uses information, including its Privacy Notice, is available at [www.phin.org.uk](http://www.phin.org.uk).

***Purpose 7: Complying with our legal or regulatory obligations, and defending or exercising our legal rights***

48. As a provider of healthcare, Premier Vascular is subject to a wide range of legal and regulatory responsibilities which it is not possible to list fully here. Premier Vascular may be required by law or by regulators to provide personal information, and in which case Premier Vascular will have a legal responsibility to do so. From time to time, clinicians are unfortunately also the subject of legal actions or complaints. In order to fully investigate and respond to those actions, it is necessary to access your personal information (although only to the extent that it is necessary and relevant to the subject-matter).

49. Legal grounds:

a) The use is necessary in order for us to comply with our legal obligations

50. Additional legal ground for special categories of personal information:

a) Premier Vascular need to use the data in order for others to provide informed healthcare services to you

b) The use is necessary for reasons of the provision of health care or social care or treatment or the management of health care or social care systems

c) The use is necessary for establishing, exercising or defending legal claims

51. Premier Vascular is also required by law to conduct audits of health records, including medical information, for quality assurance purposes. Your personal and medical information will be treated in accordance with guidance issued by the Care Quality Commission (England), Health Inspectorate Wales and Healthcare Improvement Scotland.

*Purpose 8: Managing Premier Vascular's business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice)*

52. In order to do this, Premier Vascular will not need to use your special categories of personal information and so Premier Vascular have not identified the additional ground to use your information for this purpose.

53. Legal grounds:

- a) Premier Vascular having an appropriate business need to use your information which does not overly prejudice you

*Purpose 9: Provide marketing information to you (including information about other products and services offered by selected third-party partners) in accordance with preferences you have expressed.*

54. As a provider of private healthcare services, Premier Vascular needs to carry out marketing but is mindful of your rights and expectations in that regard. As a result, Premier Vascular will only provide you with marketing which is relevant to its business and only where you have specifically confirmed your consent to do so.

55. Legal grounds:

- a) Premier Vascular having an appropriate business need to use your information which does not overly prejudice you
- b) You have provided your consent

**Disclosures to third parties:**

56. Premier Vascular may disclose your information to the third parties listed below for the purposes described in this Privacy Notice. This might include:

- a) A doctor, nurse, carer or any other healthcare professional involved in your treatment
- b) Other members of support staff involved in the delivery of your care, like receptionists and porters
- c) Anyone that you ask Premier Vascular to communicate with or provide as an emergency contact, for example your next of kin or carer
- d) NHS organisations, including NHS Resolution, NHS England, Department of Health
- e) Other private sector healthcare providers
- f) Your GP
- g) Your dentist
- h) Other clinicians (including their medical secretaries)
- i) Third parties who assist in the administration of your healthcare, such as insurance companies

- j) PHIN
  - k) National and other professional research/audit programmes and registries, as detailed under Purpose 4 above
  - l) Government bodies, including the Ministry of Defence, the Home Office and HMRC
  - m) Our regulators, like the Care Quality Commission, Health Inspectorate Wales and Healthcare Improvement Scotland
  - n) The police and other third parties where reasonably necessary for the prevention or detection of crime
  - o) Our insurers
  - p) Debt collection agencies
  - q) Credit referencing agencies
  - r) Our third party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and tax advisers
  - s) Selected third parties in connection with any sale, transfer or disposal of our business
57. Premier Vascular may communicate with these third parties in a variety of ways including, but not limited to, email, post, fax and telephone.

#### **What marketing activities does Premier Vascular carry out?**

58. Premier Vascular may also use your personal information to provide you with information about products or services which may be of interest to you where you have provided your consent for Premier Vascular to do so.
59. If you no longer wish to receive marketing emails, you can click on the "unsubscribe" link that appears in all of Premier Vascular's emails, otherwise you can always contact Premier Vascular using the details set out on page 1 of this Notice to update your contact preferences.
60. If you no longer wish to receive non-website based marketing information, please contact Premier Vascular.

#### **Automated Decision Making**

61. An automated decision is a decision made by computer without any human input, and there will be no automated decision-making in relation to your treatment or other decisions which will produce legal or similarly significant effects.

#### **How long does Premier Vascular keep personal information for?**

62. Premier Vascular 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 Premier Vascular's legal and regulatory obligations.
63. If you would like further information regarding the periods for which your personal information

will be stored, please contact Premier Vascular using the details outlined on Page 1 of this Notice.

### **International data transfers**

64. Premier Vascular (or third parties acting on behalf of Premier Vascular) may store or process information that we collect about you in countries outside the European Economic Area (EEA). Where Premier Vascular make a transfer of your personal information outside of the EEA, Premier Vascular will take the required steps to ensure that your personal information is protected.
65. Premier Vascular will only transfer your data to the extent that it is relevant and necessary. Under certain circumstances, Premier Vascular may request your consent for such a transfer.
66. If you would like further information regarding the steps Premier Vascular take to safeguard your personal information, please contact Premier Vascular using the details provided on Page 1 of this Notice.
67. Please note that Premier Vascular have listed above the current common transfers of personal data outside of the EEA but it may be necessary, in future, to transfer such data for other purposes. In the event that it is necessary to do so, we will update this Privacy Notice.

### **Your rights**

68. Under data protection law you have certain rights in relation to the personal information that Premier Vascular hold about you. These include rights to know what information Premier Vascular holds about you and how it is used. You may exercise these rights at any time by contacting Premier Vascular using the details provided on page 1 of this Notice.
69. There will not usually be a charge for handling a request to exercise your rights.
70. If Premier Vascular cannot comply with your request to exercise your rights we will usually tell you why.
71. There are some special rules about how these rights apply to health information as set out in legislation including the Data Protection Act, the General Data Protection Regulation as well as any secondary legislation which regulates the use of personal information.
72. If you make a large number of requests or it is clear that it is not reasonable for Premier Vascular to comply with a request then we do not have to respond. Alternatively, Premier Vascular can charge for responding.

Your rights include:

### **The right to access your personal information**

73. You are usually entitled to a copy of the personal information Premier Vascular hold about you and details about how Premier Vascular use it.
74. Your information will usually be provided to you in writing, unless otherwise requested. If you have made the request electronically (e.g. by email) the information will be provided to you by

electronic means where possible.

75. Please note that in some cases Premier Vascular 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.
76. You are entitled to the following under data protection law.
- a) Under Article 15(1) of the GDPR Premier Vascular must usually confirm whether Premier Vascular have personal information about you. If Premier Vascular does hold personal information about you Premier Vascular will usually need to explain to you:
    - i. The purposes for which Premier Vascular use your personal information
    - ii. The types of personal information Premier Vascular hold about you
    - iii. Who your personal information has been or will be shared with, including in particular organisations based outside the EEA.
    - iv. If your personal information leaves the EU, how Premier Vascular will make sure that it is protected
    - v. Where possible, the length of time Premier Vascular expects to hold your personal information. If that is not possible, the criteria Premier Vascular use to determine how long Premier Vascular hold your information for
    - vi. If the personal data Premier Vascular hold about you was not provided by you, details of the source of the information
    - vii. Whether Premier Vascular make any decisions about you solely by computer and if so details of how those decision are made and the impact they may have on you
    - viii. Your right to ask Premier Vascular to amend or delete your personal information
    - ix. Your right to ask Premier Vascular to restrict how your personal information is used or to object to Premier Vascular's use of your personal information
    - x. Your right to complain to the Information Commissioner's Office
  - b) Premier Vascular also needs to provide you with a copy of your personal data, provided specific exceptions and exemptions do not apply.

### **The right to rectification**

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

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

78. Premier Vascular may update this Privacy Notice from time to time to ensure that it remains accurate, and the most up-to-date version can always be found at [www.premiervascular.co.uk/privacy-policy](http://www.premiervascular.co.uk/privacy-policy). In the event that there are any material changes to the manner in which your

personal information is to be used then Premier Vascular will provide you with an updated copy of this Privacy Notice.

79. In some circumstances, you have the right to request that Premier Vascular delete the personal information Premier Vascular holds about you. However, there are exceptions to this right and in certain circumstances Premier Vascular can refuse to delete the information in question. In particular, for example, Premier Vascular does 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, exercising or defending legal claims.

#### **The right to restriction of processing**

80. In some circumstances, Premier Vascular must "pause" the use of your personal data if you ask Premier Vascular to do so, although Premier Vascular do not have to comply with all requests to restrict the use of your personal information. In particular, for example, Premier Vascular does 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**

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

#### **The right to object to marketing**

82. You can ask Premier Vascular to stop sending you marketing messages at any time and Premier Vascular must comply with your request. You can do this by contacting Premier Vascular using the details provided on page 1 of this Notice.

#### **The right to not to be subject to automatic decisions (i.e. decisions that are made about you by computer alone)**

83. You have a right to not be subject to automatic decisions (i.e. decisions that are made about you by computer alone) that have a legal or other significant effect on you.
84. Please see section 60 for detail about when we may make automatic decisions about you.
85. If you have been subject to an automated decision and do not agree with the outcome, you can challenge the decision.

#### **The right to withdraw consent**

86. In some cases Premier Vascular may need your consent in order for Premier Vascular's use of your personal information to comply with data protection legislation. Where we do this, you have the right to withdraw your consent to further use of your personal information. You can do this by contacting Premier Vascular using the details provided on page 1 of this Notice.

### **The right to complain to the Information Commissioner's Office**

87. You can complain to the Information Commissioner's Office if you are unhappy with the way that Premier Vascular has dealt with a request from you to exercise any of these rights, or if you think Premier Vascular has not complied with its legal obligations.
88. More information can be found on the Information Commissioner's Office website:  
<https://ico.org.uk/>
89. Making a complaint will not affect any other legal rights or remedies that you have.

### **National data opt-out programme**

90. NHS Digital has developed a national data opt-out programme which will be launched on 25 May 2018, pursuant to which all patients will be able to log their preferences as to sharing of their personal information. All health and care organisations will be required to uphold patient choices, but only from March 2020. In the meantime you should make Premier Vascular aware directly of any uses of your data to which you object.

### **Updates to this Privacy Notice**

91. Premier Vascular 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 Premier Vascular process your personal data then Premier Vascular will provide you with an updated copy of the Policy.
92. This Privacy Notice was last updated on 12th August 2018.