Privacy Policy

Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you.

Data Controller

Hampshire Mental Health Partners LLP is a limited liability partnership, (registered in England and Wales, under partnership number: OC455972). References in this privacy policy to "us" or "we" are also references to Hampshire Mental Health Partners LLP.

Hampshire Mental Health Partners LLP is the controller of, and responsible for, your personal data.

We are registered with the Information Commissioners Office and Dr Jothi Naidoo is our Data Protection Officer (DPO). If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our DPO using the details set out below.

The Data Protection Officer
[Hampshire Mental Health Partners LLP]
Cumberland House,
Grosvenor Square,
Southampton.
Hampshire
SO15 2BG

Types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and

versions, operating system and platform, device ID and other technology on the devices you use to access this website.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share a**ggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

How is your personal data collected?

We use different methods to collect data from and about you including through. For example, you may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise.

How we use your personal data

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example (i) in providing you with, or planning for, healthcare services and (ii) ensuring high standards of quality and safety healthcare. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law or regulation).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to (and for reasons of substantial public interest).
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.
- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you (eg. in relation to the provision of our services).

Purposes for which we will use your personal data

We have set out below a description of the ways we plan to use the various categories of your personal data (based on the various legal basis and legitimate interests referred to above).

Purpose/Use	Type of data
Providing our service to you, including treatment and record keeping	Name, DOB, contact details (including details of next of kin), GP details, medical and medication history, notes relating to any physical or mental health assessments and examinations or clinical sessions, treatment records, test results, referrals. Such data may include details of medical conditions, weight, lifestyle and other information that might be relevant to your health such as race, ethnicity, sex life or sexual orientation.
Communicating regarding any concerns, queries or complaints	Name, contact details, any relevant information including health.
Quality assurance, quality improvement	Health data relating to clinical sessions.
Complying with our legal or regulatory obligations, retaining evidence of the treatment / advice we have given you	All personal data held by us where necessary

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Protecting Your Personal Data

As clinicians, we have to remain up to date with mandatory training, which includes training on data protection and safe storage and protection of data.

We will only share your personal data with organisations involved with your care for example your GP, with your permission, unless we have a legal obligation to share with another party.

Any sharing with parties or companies is processed under an agreement i.e., data processing agreement/data sharing agreement where applicable. Where personal data

will be shared outside the purposes of providing you care we will inform you unless the law restricts us from doing so.

Internally, we only grant access to personal data (including special category personal data) to those people that need access to that data to carry out their role.

Where we store and process your data

We use an online electronic patient records platform called Cliniko to process and store your personal data. We have chosen Semble as it is used by a number of other healthcare providers and provides high levels of data security with secure communication between ourselves and our patients. All data held on Cliniko is held on UK servers meaning that data protection and compliance is to UK legal requirements and GDPR standards. For further information see; How Cliniko helps you comply with UK GDPR | Cliniko Help[In the event that any of your personal data is transferred out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that applicable safeguards are implemented.] In summary therefore, we meet the principles of data protection (under the General Data Protection Regulation (GDPR) and Data Protection Act) by:

- Ensuring that we seek a lawful basis for collecting, processing and sharing personal information.
- Making sure that individuals are made aware of what personal information will be collected and how it will be processed.
- Restricting the processing of data to the purposes for which it is specified to be processed.
- Only collecting and processing information which is necessary for carrying out our services and taking reasonable measures to ensure such information is kept relevant and up-to-date.
- Keeping all personal information safe and secure, through appropriate storage and transfer methods.
- Ensuring that personal information is only kept for as long as required/necessary by our professional bodies.

Third Party Links on our website

Please note that our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.You have a number of rights under data protection laws in relation to your personal data. There are some exceptions to this however, which include: (i) if information has been provided about the

individual by someone else and they have not given their permission for this to be shared with them (third party information); or (ii) the information is considered to have the potential to cause mental or physical harm to the individual or someone else.

Subject to the exceptions above, you have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you wish to exercise any of the rights set out above, please contact our DPO (referred to at the beginning of this privacy policy). You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no

right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

In our experience, complaints are usually down to miscommunications which can usually be resolved through listening to the concerns raised and an open discussion. We would thus, firstly, seek to address concerns through this method.

However, if a discussion is unable to resolve concerns, our clinicians are all members of the Independent Doctors Federation which provides an independent complaints route.

They can be contacted via;

Independent Doctors Federation
Lettsom House
11, Chandos Street,
London
W1G 9EB
Tel. 020 3696 4080