

Patient and Website Privacy Policy



VERSION HISTORY

Version	Implementation date	Description	Changes Revisions /	Name	Next review
1.0	30.03.2022	Patient Privacy	New Policy	Dr Neil Bhadresha	March 2023
2.0	30.03.2023	Patient Privacy	Revised Policy	Dr Neil Bhadresha	March 2024
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1. Objective

This policy aims to demonstrate transparency about how your data is collected, stored and processed as well as the procedure to make a complaint.

1.1. Under the General Data Protection Regulation and Data Protection Act 2018, we are required to explain to our patients why we collect information about you, how we intend to use that information and whether we will share this information with anyone else.

1.2. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. You have a right to complain to the ICO if you are not satisfied with how your data is being used.

1.3 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing

Our full contact details are as follows

Pop Up Docs Limited

28-29 Wilcox Close

London, SW8 2UD

2. Introduction

As a General Practitioner service we use information about you to provide you with a high quality healthcare services. We may also collect and store sensitive data, for example information about your health, racial and ethnic origin, and sexual orientation to make diagnostic decisions. We may share your data with third parties, including other healthcare providers who may contribute to your care, your GP, statutory bodies concerned with the regulation of your care, and other agencies who may be involved in your care. We respect the

security of your data and treat it in accordance with the law in order to not endanger confidentiality.

2.1 Personal Data

We may collect forms of personal data, such as:

personal details (such as name, date of birth, gender);

contact details

financial information (such as your bank account details and information about your financial circumstances);

information about your next of kin (for the purpose of emergency contact details);

information about other healthcare providers (such as your GP and practice details);

video and photographs of you (such as CCTV footage, photographs for security purposes, etc):

usage data - information about how you use our website and services

2.2 Special Categories Of Personal Data

We may also collect data based on:

race or ethnicity

religion

sex life and sexual orientation;

information pertaining to any disabilities or special requirements

medical records relating to your treatment by us

your medical history

records required by care regulators.

We will only use this personal data where with your consent to do so or where we otherwise have a legal or regulatory obligation to do so.

2.3 Data Aggregation

We also collect, use and share **anonymised and aggregated data** (“Aggregated Data”) such as statistical or demographic data for our own internal and marketing purposes. Aggregated Data can be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if the aggregated data can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

2.4 Data Collection

While your personal data, as detailed, may be collected through direct means, such as providing it on making an appointment, we may also collect **technical data through automated technologies** or interactions. For example, interacting with our website may provide us with data about your browsing actions and patterns. This is collected through cookies, server logs and other similar technologies. Furthermore, technical data may be collected if you visit other websites which employ our cookies.

While this aggregated data is non personal, Google does provide us with information based on your Network Location, Pages Visited, Referring Website, Browser and Operating System, Translations, Sessions, Scroll Depth and Interactions with Widgets.

3. Procedure

This section pertains to our reasons to use this information

Reasons to Use Information In a Lawful manner, **along with our lawful reasons to use the Information, which are highlighted in bold**

3.1 To provide you with safe, appropriate and personalised care in order to meet your individual requirements as a patient

We are obliged to due so for legal and regulatory body reasons

Protection of our patients best interest

Explicit consent will be sought

3.2 We may use your data to provide you with a safe and appropriate services for COVID testing. **This is because we are obliged to due so for legal and regulatory body reasons**

3.3 Administrative matters which are necessary for the day to day functioning of our organisation. This may occasionally include the prevention, detection and investigation of fraud and corruption.

3.4 Administering payments for your treatment by us, in order **to fulfill our legal contract**

3.5 Quality Improvement. Analysing the quality of care delivered to our patients as part of our continuing service improvement. This also includes the handling of complaints made, or concerns raised. Voluntary patient surveys are also important to us to help us drive quality improvement. We may use your data **for legal and regulatory body reasons, and for the best interests of the patient.**

3.6 Safeguarding and regulation: We use your personal data for the purpose of safeguarding and regulation of healthcare

3.7 Communication: We may need to use your personal information to communicate with you before, during and after your treatment. For example sharing blood test results and follow up procedures. **This is to protect our patient's best interests as well as for legal**

and regulatory body reasons.

3.8 Marketing: We may use your personal information to notify you of details of our p services which we think may be of benefit to you.

3.9 Security: We may need to capture images of you as part of our security processes such as use of CCTV footage. **This is to provide protection and safety to our staff and also to our patients.**

4. GDPR and The Data Protection Law :

We will abide by the data protection principles which say that data is

4.1 processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency')

4.2 collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation')

4.3 adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')

4.4 accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')

4.5 kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation')

4.6 processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')

5. Sharing Information :

We may share your data with third parties providing there is a lawful reason to do so. Data must be shared in a fair, safe and transparent way. We may share your data with certain types of organisations, such as:

5.1 Other medical service providers involved directly with your care including laboratory services, imaging centre or specialists to whom you have requested a referral. We may also share your information with your GP providing we have explicit consent.

5.2 Collection or Delivery services including courier services such as Royal Mail in order to deliver/collect products or tests that you have ordered from us. We will keep this data to a minimum and only share this in a lawful way.

5.3 We may be asked by your employer if you have attended an appointment, if you receive the appointment as part of an employee benefit. We will not share any personally identifiable data or medical details without your explicit consent to do so

5.4. Regulators / Safeguarding authorities / Commissioners/ Police or Law Enforcement Agencies: We are legally bound to share data with regulatory bodies, when there is appropriate concern (i.e if the information is required for criminal investigations and law e

5.5. IT service providers: We may use external IT providers who may have access to your personal data from time to time as is necessary to perform their services.

5.6. Attorneys: If you have granted power of attorney for health or financial matters we may be obliged to share your personal information with them

5.7. We may share your personal information with your next of kin in an emergency

6. Transferring Information Outside Of The EU

If we are asked to provide a consultation by an international medical assistance provider and travel insurer, patients sign a consent form to have data passed back to the Medical Assistance Provider. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Please see the full details of the European commission policies

1. Adequacy of the protection of personal data in non-EU countries.
2. Model contracts for the transfer of personal data to third countries.
3. EU-US Privacy Shield.

7. Requesting Information

7.1 Requesting Information

A “data subject access request” enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

You should request a correction of inaccurate or incomplete personal information.

7.2 Requesting Erasure Of Information

In certain circumstances you may ask us to delete or remove personal information where there is no good reason for us continuing to process it.

You may also object to the processing of your personal information where there is a lawful

basis for processing, and there is something about your particular situation which leads you to object to processing on this ground. This includes processing your personal information for direct marketing purposes.

On this subject you may also ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

8. Withdrawal Of Consent

There are circumstances where we rely on your consent as our lawful basis to process your data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. If you provide us with notification that you wish to withdraw consent we will no longer process your information for the purpose you originally agreed to, unless we have another legitimate basis for doing so in law.

9. Recording Consultations

9.1 Recording & Consent Policy

Pop Up Docs / GP and Me may make audio or video recordings of consultations for purposes relating to patient and clinician safety, safeguarding, clinical governance, complaint resolution, regulatory compliance, and legal defence.

9.2 Consent to Recording

By booking and attending an appointment with Pop Up Docs / GP and Me, the patient acknowledges and provides implicit consent that:

a consultation may or may not be recorded for safety, governance and legal purposes,

any recording may be securely stored as part of the clinical record, and

recordings may be used where necessary as evidence in internal, regulatory or legal proceedings.

Patients retain the right to request that recording be stopped at any time during the consultation unless required for safety, safeguarding or legal-protection reasons.

9.3 Use and Disclosure

Recordings will be stored securely and only viewed by authorised clinical or governance staff. Recordings will not be shared outside Pop Up Docs / GP and Me without explicit consent unless required by:

court order, legal claim or regulatory process,

safeguarding or statutory disclosure obligations,

defence of the clinic or its clinicians against complaint or legal action.

9.4 Evidence

Recordings may be relied upon and submitted as evidence where relevant to a complaint, investigation, regulatory process or court proceedings.

9.5 Patient-Initiated Recordings

Patients may record consultations for personal use; however, courtesy notification to the clinician is requested. Recordings intended to form part of the clinical record must be agreed separately.

9.6 Retention

Recordings are retained in accordance with medical-records law and data-protection legislation.