



## **PRIVACY POLICY**

### **Summary**

This privacy notice tells you what to expect us to do with your personal information when you contact us or use one of our services. At THH, we are committed to protecting your personal information and respecting your privacy. This Privacy Policy outlines how we collect, use, and safeguard your information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### **Who are we**

We are a private healthcare provider, founded by clinicians with the mission of delivering the highest standards of care to all. Our goal is to empower our service users to manage their conditions independently.

We are a trusted partner of the NHS and have been providing our range of services to the NHS, GPs and primary care networks since 2014.

### **What type of information do we have**

The type of information that we collect, and hold is personal, sensitive and confidential information, that can be used to identify a living person, consisting of personal identifiers, contacts and characteristics that consists of:

- Name
- Addresses
- Telephone numbers / email addresses
- NHS numbers / Hospital specific identifiable numbers
- Medical history
- Consultation notes
- Diagnosis and treatment plans

We may collect and process the following categories of personal data:

- Personal Identification Information: Name, date of birth, address, phone number, email address, and NHS number.
- Health Information: Medical history, treatment plans, test results, prescriptions, and other health-related details.
- Communication Data: Notes from consultations, emails, and feedback provided.
- Administrative Data: Appointment records, referrals, and billing information (if applicable).

### **How do we get the information and why do we have it**

We collect personal, sensitive and confidential data on a needs-must basis, to be able to provide patient care. The information we collect and store is the minimum necessary to enable the organisation to act in the best interests of the patient with regards to their health and wellbeing referral. The data we receive originates from either NHS or Private health organisations (primary and secondary care) or personal disclose (patient directed self-referrals).

Patients have the right to withdraw consent to the sharing of their personal information by informing their GP practice or referrer.

### **What we do with the information**

THH will only share patient or staff sensitive and confidential information on a needs-must basis. An example of this would be onward referral to another speciality or provider (patient



consented) or results back to the referring clinician. These are examples and is not an exhaustive list.

### **How do we store your information (Your data protection)**

The personal, sensitive and confidential information that we hold and collect is held on a centrally hosted clinical computer system called SystemOne. Once care is completed, we discharge patients from our care which removes patients from our accessibility. Referrals that are received are stored on a secure email address and are transferred to patients records on SystemOne once processed.

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information are: Legitimate basis.

This means that you can remove your consent at any time. You can do this by contacting your GP practice of referrer.

All of your information is kept in accordance with the Records Management Code of Practice for Health and Social Care 2023. Please visit the NHS England website.

In general terms, medical information is retained for at least 8 years after treatment; or for children until they reach at least 25 years old. There are exceptions to this.

Any enquiries should be made directly to the Data Protection Officer.

### **Who do we share your Information with:**

We may share your information with:

- NHS Organisations: GPs, hospitals, and other NHS providers involved in your care.
- Private health organisations whereby you are being treated within a private pathway or have asked to be referred.
- Third-Party Providers: Services that support healthcare delivery (e.g., diagnostic labs, IT systems).
- Regulatory Bodies: Organisations like the Care Quality Commission (CQC) for compliance purposes.
- Safeguarding Authorities: If required to protect your welfare or others.

### **What are your Rights**

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your data in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us if you wish to make a request.

**INFORMATION GOVERNANCE POLICY THH POL 006**  
**Appendix K**



Our contact details:

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