

# Privacy Policy (England)

Version 22



## What is this document?

Along with the service End User Licence Agreement, this policy explains how we collect, store and handle your information across all our services. We review this policy from time to time to make sure it's up-to-date. If we ever make any significant changes, we will let you know when you next access the service, or by some other channel if appropriate.

## Who are you?

We are Engage Health Systems Ltd, a specialist software company based in North Norfolk in the United Kingdom. Engage Health Systems provide services that process your data on behalf of your surgery under the terms of a Data Processing Agreement. The [legal basis](#) under which we do this is Public Task (Article 6 of the GDPR legislation) in order to provide medical treatment (Schedule 9 of the same). If you are unsure what this means, please get in touch - our full contact details are at the end of this document.

## Why do you collect my data?

We only use your information to enable your surgery to deliver the services you've requested. We also might collect it where it's necessary to exercise or comply with the law, or for service improvement as set out in this policy.

## What data do you collect?

This depends very much on which of our services you are using and in which context. It can range from something small like the browser you are using to something very personal and sensitive. The full range of data we may collect is:

- Full name
- Date of Birth
- Gender
- NHS Number
- Address
- Postcode
- Telephone Number
- e-mail address
- Registered Surgery
- Any medical data you may enter
- File data you provide, such as images
- Appointment data
- Message data
- Audit data
- Salted and hashed password

Please be aware that if you are using the service on behalf of someone else (your child, for example), some of the data listed above will relate to them. As a key principle, we don't collect more information than we need to allow your surgery to assist you safely and securely. If you ever want

to see what data we hold, it is one of your rights to ask us to give you a copy on request - you can do this yourself if you have a user account from your "Settings" area.

## Automated Routing of your Data

We provide software products to healthcare organisations involved in your care. These healthcare organisations "Data Controller" are responsible for how your information is used. When they want to use our software to communicate with or about you, they provide our platform with the information and instruct us how to use it.

## NHS login

Please note that if you access our service using your NHS login details, the identity verification services are managed by NHS England. NHS England is the controller for any personal information you provided to NHS England to get an NHS login account and verify your identity, and uses that personal information solely for that single purpose. For this personal information, our role is a "processor" only and we must act under the instructions provided by NHS England (as the "controller") when verifying your identity. To see NHS England's Privacy Notice and Terms and Conditions, please [click here](#). This restriction does not apply to the personal information you provide to us separately.

## How do you keep my data safe?

Protecting our customer's data is really important to us. We use specialist hosting facilities that are located in the UK, and industry-standard methods with "Best practice" to protect your data.

## How long do you hold my data for?

We keep your data (on behalf of your surgery) for as long as we need it to deliver our services, or are required to for legal reasons. After that, we then delete it. We do treat data slightly differently depending on what it's being used for, but it is another of your rights to be able to ask us to delete your personal data at any time. Again, you can do this yourself if you have a user account from your "Settings" area.

## What about Cookies?

A cookie is a small data file that is stored on your computer or device. Cookies record things like your preferences and settings, helping to give us the information we need to provide you with the most consistent and relevant experience. We also use cookies to record information about experiments or new improvements we might test to find out whether they were effective. We don't use advertising cookies, though - our Cookie Policy explains in more detail.

## You mentioned my rights – tell me more

If you've established an account, you can access, edit or delete the personal data associated with your profile at any time. If applicable to the service you are using, you can also manage your preferences on how we use and share your data.

You have the right to ask us for a copy of your personal data; to correct, delete or restrict processing of your personal data; and to obtain the personal data you have provided to us in a structured, machine readable format. In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement). Where we have asked for your consent, you may withdraw consent at any time. If you ask to withdraw your consent, this will not affect any processing which has already taken place at that time.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. If you have unresolved concerns, you have the right to complain to a data protection authority, such as the [Information Commissioner's Office](#).

If you have any questions of feedback relating to this policy or any of your rights, you can address them to our Data Protection Officer by email to [dpo@engagehealth.uk](mailto:dpo@engagehealth.uk) or by post to our registered offices:

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