

## **Privacy Statement**

This privacy statement sets out what you can expect of Choose Occupational Health as Data Controller and Data Processor, what kind of information is collected by us and how we use this information. We are committed to protecting the privacy and confidentiality of the information we hold of users of website, our client portal, suppliers, employees being assessed, or utilising, our service and other individuals for a variety of business purposes.

We acknowledge that Choose Occupational Health will not only comply with the requirements of the current data protection legislation, but additionally meet all our ethical and professional bodies' guidelines and codes of practice regarding privacy and confidentiality.

For the purpose of the current Data Protection legislation, the data controller is Choose Occupational Health of 14 Hartington Place, Carlisle, CA1 1HL and is registered with the Information Commissioners Office (ICO) registration number Z291518X.

### **Collection and processing of personal data on our website**

For the purpose of system security, when you visit our website, our web server temporarily registers the domain name or the IP address of the requesting computer as well as the date of access, the file request of the client (file name and URL), the HTTP response code and the website from which you are visiting us, and the number of bytes transferred during the session. We might also, in some cases, store some information in the form of 'cookies' on your PC so that we can optimise our website according to your preferences. Please see the 'Cookies' section for more information.

We will only store personal information provided by you i.e. your name, employer name, email address etc, if you voluntarily complete the 'contact us' section or send us emails. All information you provide is stored in our secure server. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Clients using the Lumeon portal (previously known as Qinec)**

Our Clinical Management System has a Client Portal provided by Lumeon Limited of 10 Leake Street, London, SE1 7NN. Lumeon Limited's processes and procedures are audited to the ISO27001 Information Security Management System standard. Software services are all hosted in secure ISO27001 accredited third party data centres in the EEA in compliance with UK data protection laws. All client data is encrypted both at rest using 256-bit encryption and in transit using TLS encryption.

All our security and protection measures meet both current legislation in the UK and the ethical guidelines issued by the General Medical Council (GMC), Nursing and Midwifery Council (NMC) and Faculty of Occupational Medicine (FOM).

## **Collecting and processing of data for Individuals who may be referred to our service**

### **Lawful Basis for processing the information.**

Article 9(2)(h) and Article 9(3) specifically authorises the processing of data under circumstances where this is “necessary for the purposes of Occupational Medicine and processed by a regulated health professional“. We have developed procedures and IT security measures to ensure the protection of the data we hold. We are also governed by GMC, NMC and FOM and registered with the ICO, all of which have guidelines and ethical codes that we follow to ensure your confidentiality. You can request a full copy of our Data Protection Policy by contacting the Admin Team at [office@chooseoh.co.uk](mailto:office@chooseoh.co.uk)

### **What data will be collected?**

Due to the nature of our work, we manage both personal and sensitive data, as classified under the current data protection legislation. We will only obtain personal and sensitive data to provide occupational health advice, physiotherapy and counselling services. We will be provided with information provided by either you, your GP, your employer (e.g. HR, manager) or a third party (e.g. OH clinics working on behalf of Choose Occupational Health under direct instruction). This would be as part of an on-employment medical or management referral to determine your fitness for work and assess if you require any reasonable adjustments as a result of a health condition; or to access support services from a physiotherapist or counsellor.

### **Who will my information be shared with?**

To ensure effective management of your health at work it may be necessary to share your information with the Choose OH team, your GP, a physiotherapist or talking therapist. We will always gain your consent before sharing information with your employer.

### **How long will data about me be held?**

We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a manner consistent with our data retention guidelines in accordance with regulatory and legislative requirements. A copy of our Data Retention Policy can be requested by contacting our Admin Team at [office@chooseoh.co.uk](mailto:office@chooseoh.co.uk)

## Cookies and similar technology

www.chooseoccupationalhealth.co.uk uses cookies and similar technical tools to collect information about your access to the site and the services we provide.

A cookie is a small text file that contains a unique label or cookie ID number. When you visit a website that uses cookies, the website sends a cookie to your browser's software and it is stored on your computer even after you leave the site. When you visit the website at a later date the cookie's ID number is sent back to the website, allowing the website to recognise the user which can be really useful for you. This remembers you on repeat visits effectively letting you move around the site without having to keep re-introducing yourself.

### We use cookies to:

- Remember that you have used the site before; this means we can identify the number of unique visitors we receive to different parts of the site.
- Store your preferences so that you do not need to input these every time you visit the site.
- Customise elements of the layout and/or content of the pages of the site for you.
- Collect statistical information about how you use the site so that we can improve the site.
- Gather information about the pages on the site that you visit, and also other information about other websites that you visit, so as to place you in a "market segment".

This information is only collected by reference to the IP address that you are using, but does include information about the county and city you are in, together with the name of your internet service provider.

Some of the cookies used by our site are set by us, and some are set by third parties who are delivering services (such as interest based advertising directed at your market segment) on our behalf.

Most web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set.

Visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) will provide information on settings within your browser as well as other useful information on cookies.

Please note however, that by blocking or deleting cookies used on the site you may not be able to take full advantage of the site if you do so.

If you continue using this site we will assume that you are happy to receive all cookies and similar technical tools from this site and reserve the right to amend, remove or add new cookies and similar technical tools at any time.

### **Your Rights:**

You have the right to see any information we hold about you. You can request copies of your records, these are referred to as a 'Subject Access Request' or SAR. If you would like to access your records, the request should be made in writing and sent to the postal address stated at the top of this statement. The letter must include your full name, address and date of birth and you must request in the letter the specific information you request; for example '*copies of my occupational health records held by Choose Occupational Health*'. We will respond to your request within 28 days, without charge and a security check will be made to verify your identity before we will release this information.

If you believe that any information we hold about you is incorrect or incomplete, please email us at [office@chooseoh.co.uk](mailto:office@chooseoh.co.uk) and we will rectify the error.

### **Third Parties**

Our website may, from time to time, contain links to other websites of interest. Please note, these websites have their own privacy policies and we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Changes to our privacy statement**

We regularly review our privacy notice to ensure that it is current and accurate. Any changes we may make to our Privacy Policy in the future will be posted on this page

### **Making a complaint**

If you're unhappy with any aspect of our website or this privacy statement please let us know using the email address below. For more information please request a copy of our Complaints Policy by contacting the Admin Team or viewing this on our website.