

Newson Health privacy policy for patients

Effective Date: 23/01/2023

This document is designed to help you understand why and how we use your personal data. By personal data we mean information that relates to a living individual and which can identify or be identified with that individual.

We are Newson Health Limited, a company with number 11106782 and registered office at Winton House, Church Street, Stratford-Upon-Avon, Warwickshire, CV37 6HB.

Below, we have tried to provide you with as much information as we possibly can to explain how your personal data may be used. We take your privacy very seriously. 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

Newson Health Limited (referred to as "we", "us" or "our" in this privacy policy) is a limited company with registration number 11106782. Newson Health is the Controller of the personal data to which this privacy policy relates. This means that we are responsible for making sure that we process your personal data in a safe and lawful way.

We have appointed a data protection officer ("DPO") whose role includes overseeing questions in relation to how we process your personal data. 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.

Contact Details

Our full name: Newson Health Limited 11106782, Winton House, Church Street, Stratford-Upon-Avon, Warwickshire, CV37 6HB

Email and postal address for contacting us and our DPO: Newson Health Email address:

info@newsonhealth.co.uk

Registered Office: Winton House, Church Street, Stratford-Upon-Avon, Warwickshire, CV37 6HB
Telephone: 01789595004

The DPO Centre Email address: cb@dpocentre.com

The DPO Centre, 50 Liverpool Street, London, EC2M 7PY, UK
Telephone: 02037971289

Personal data is any information we have that can identify you, such as your name, date of birth, or medical history.

Our data retention period, which is the length of time we hold your personal data, is informed by NHS England, professional bodies and our own retention schedule.

We might also keep some information that doesn't identify you to help improve our business and our services as well as helping with health research. We do this by removing your identifiable information such as your name, date of birth, contact details to form 'deidentified' data.

We process the following personal data for the purposes listed. Where we use personal data, we will only use the minimum necessary personal data for that purpose.

Patients:

| Purposes | Types of personal data | Retention period | Lawful basis |
|---|---|---|---|
| <p>Providing Our service to you including treatment, record keeping</p> | <p>Name</p> <p>Contact details GP details</p> <p>Details of accompanying persons and/or next of kin</p> <p>Medical history*/Medication usage</p> <p>Notes regarding any physical mental health assessments/examinations carried out</p> <p>Results of any tests that we refer the individual to Information about onward referrals made to other support services</p> <p>Any feedback provided to us by the individual. * This may include details of medical conditions, medication, weight, lifestyle and other information that might be relevant to your health such as race, ethnicity, sex life or sexual orientation</p> | <p>We will keep your data for 8 years</p> | <p>Article 6 (1) b ... processing is necessary for the performance of a contract to which the data subject is party; and; The provision of health or social care or treatment [Article 9(2)(h)]</p> |

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| <p>Communicating regarding any concerns, queries or complaints</p> | <p>Name, contact details, any relevant information including health</p> | <p>We keep your data for 10 years</p> | <p>Providing you or planning for healthcare services in our We keep your data for up to 10 years, which will vary on the type of research 'legitimate interest' [Article 6(1)(f)] and; Ensuring high standards of quality and safety of health care [Article 9(2)(i)]</p> |
| <p>Quality assurance, quality improvement, training and security including conducting peer reviews of treatment conducted by clinicians delivering Newson Health services</p> | <p>Health data, video and/or audio conversations recorded through clinical sessions as well as recorded calls and emails to support teams regarding your service with us</p> | <p>We will keep your data for 8 years</p> | <p>Providing you or planning for healthcare services in our 'legitimate interest' [Article 6(1)(f)] and; Ensuring high standards of quality and safety of health care [Article 9(2)(i)]</p> |
| <p>Complying with our legal or regulatory obligations, Retaining evidence of the treatment / advice we have given you</p> | <p>All personal data held by Newson Health where necessary</p> | <p>We keep your data for 8 years, although it may be longer to comply with legal requirements</p> | <p>For compliance with a legal obligation [Article 6(1)(c) and Article 9(2)(f)] and; For reasons of substantial public interest [Article 9(2)(g)]</p> |
| <p>To conduct observational research</p> | <p>Name, DOB, address, Previous medical history, Questionnaires, Menopause Symptom Questionnaires, Prescriptions, Survey data, Appointment dates. We remove any details that could identify you from this information. This includes your name, address and contact information.</p> | <p>We keep your data for up to 10 years, which will vary on the type of research</p> | <p>Providing you or planning for healthcare services in our 'legitimate interest' [Article 6(1)(f)] and; For the public interest, scientific or statistical purposes [Article 9(2)(j)]</p> |
| <p>Marketing Information on the services we offer</p> | <p>Name, Address</p> | <p>We keep your data for up to 10 years, which will vary on the type of research</p> | <p>Article 6 (1) a ... the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> |

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| Supplier retention | Address, contact details and payment information (Video recording if you attend one of our sites) | We keep your contact details for the life of the contract plus 6 years for audit purposes | Processing is necessary for the performance of a contract [Article 6(b)] |
|--------------------|---|---|--|

Where we rely on GDPR Article 6(1)(f) 'legitimate interests' are as follows:

1. Providing health care to individuals
2. Ensuring complaints and communications are handled appropriately
3. Ensuring we provide and maintain a high level of quality of service
4. Undertaking research to further improve our service

Helping with health research

When using your de-identified data to support health research, we aim to publish our research results in peer-reviewed journals or by working with academics. We may conduct research with partner organisations such as universities or other academic institutions. We may also use data that does not identify you personally as part of statistics that we collect on certain types of illness, symptoms and conditions. This might include us contributing medical data to our partners and organisations such as NHS England. They will always be anonymised, which means you cannot be personally identified. This is so we can improve our medical knowledge, help deliver better care and help the public.

Sharing your personal data

We will only share your personal data with organisations involved with your care for example your GP, 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. These services may include Sexual Health, Social Services, Independent Sexual Violence Advisor (ISVA) Services, Talking Therapies, Mental Health, Drug & Alcohol as well as other local services.

Who do we share personal data with?

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. Externally, we may share from time to time personal data (including special category personal data) with the following categories of recipients, subject to due respect for your privacy:

- your GP and other medical practitioners or healthcare professionals involved in your care or treatment, only where we have been given express permission to do so or we have cause to believe that you are a danger to yourself or others;

• our regulators, law enforcement, intelligence services and other government authorities, where they require us to do so; and • our service providers, for instance: the companies that manage our IT infrastructure; • companies that provide us with cloud-based IT systems; • our external advisors, for instance IT consultants, accountants and lawyers, • external companies providing services to us such as blood testing and analysis of tissue samples; and

| External Company | Services provided | Types of personal data | Purpose |
|--|--|---|---|
| Nationwide Pathology Inuvi | Phlebotomy, Blood testing & sample analysis | Name, address, contact details and Medical history*/Medication usage * This may include details of medical conditions, and other information that might be relevant to your health such as race, ethnicity. | Providing Our service to you including treatment, record keeping |
| CloudRx Smartway Pharmacy The clinic | Pharmacy dispensing | Name, address, contact details and Medical history*/Medication usage * This may include details of medical conditions, and other information that might be relevant to your health such as race, ethnicity. | Providing Our service to you including treatment, record keeping |
| The Portland Hospital, part of HCA Healthcare UK 32 Wimpole Street – London | In person consultations | Name and date of birth | To allow you access to the premises where the in- person consultation is taking place. |
| Inuvi Diagnostic Centre 18 Wimpole Street – London | In person consultations | Name and date of birth | To allow you access to the premises where the in- person consultation is taking place. |

| | | | |
|--|-------------------------|------------------------|---|
| 23 Harley Street Consultation Rooms 23 Harley Street – London | In person consultations | Name and date of birth | To allow you access to the premises where the in-person consultation is taking place. |
| BankMedispa 185 Ashley Road – Hale | In person consultations | Name and date of birth | To allow you access to the premises where the in-person consultation is taking place. |

Where we store and process your data

Your data may be processed or stored outside of the UK and the European Economic Area (EEA). This is because we sometimes work with other companies who help us deliver our services to you and they might have servers outside of the UK or EEA.

This will always be in line with applicable data protection lawful mechanisms and protected by appropriate safeguards such as EU-approved standard contractual clauses, UK IDTA or a Privacy Shield certification.

For further information on how we protect your data if we transfer it outside of the EEA, contact us by email at: info@newsonhealth.co.uk

Further uses of personal data for corporate purposes:

Contractors, Third-Party Service Providers, and Suppliers:

| Purposes | Types of personal data | Retention period | Lawful basis |
|--------------------|--|---|--|
| Supplier retention | Name, address, contact details and payment information | We keep your contact details for the life of the contract plus 6 years for audit purposes | Processing is necessary for the performance of a contract [Article 6(b)] |

Patients:

| Purposes | Types of personal data | Retention period | Lawful basis |
|--|----------------------------------|-------------------------------|--|
| Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g., tax or legal advice) | Financial, contact details, name | We keep your data for 8 years | Providing you or planning for healthcare services in our 'legitimate interest' [Article 6(1)(f)] and; For compliance with a legal obligation [Article 6(1)(c)] |

Your Data Protection Rights

The UK GDPR allows various rights for people whose data is being processed. The rights are not absolute and so sometimes do not apply. Where you wish to exercise any of your rights, you may do so free of charge contacting us at info@newsonhealth.co.uk We will respond within one month. Details of the rights within UK GDPR are below. You will be informed if the right is available to you upon application:

| Right | Meaning |
|--|---|
| Access UK GDPR Article 15 | You may request a copy of the data held by us about you. |
| Rectification UK GDPR Article 16 | If you think the data held by us is wrong and you may request that it is corrected. |
| Erasure (Right to be forgotten) UK GDPR Article 17 | You can request that your data is deleted by us. |
| Restriction UK GDPR Article 18 | There are circumstances in which you may ask us to stop processing your data, but we must otherwise keep the data. For example, where required by law. |
| Portability UK GDPR Article 19 | You can ask for a copy of your data in a format that can be readily transferred to another company. |
| Objection UK GDPR Article 20 | You can object to the processing of your personal data when we are relying on a legal obligation or public duty legal basis or where we are processing in our legitimate interest, especially for direct marketing. |

Complaints

At Newson Health we want to treat personal information lawfully, correctly and in compliance with the General Data Protection Regulation (GDPR).

We will meet the principles of the GDPR 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 (our retention schedules professional bodies).

Protecting Your Personal Data

Newson Health takes protection of your personal data very seriously. Newson Health uses a range of precautions that include administrative, technical and physical measures, to safeguard your personal data against loss, theft and misuse, as well as against unauthorized access, disclosure, alteration and destruction. We store the personal data you provide encrypted on computer servers that are in highly secure and controlled facilities. We restrict access to personal data to our employees, contractors and agents who need access to operate, develop, or improve our services and the application.

We follow industry accepted security standards to protect the personal data you submit to us, both during transmission and once we receive it.

We have implemented several technical and organisational measures to ensure your personal data is kept secure. This includes:

- Independent Data Protection review
- Annual training for all staff on how to handle information securely.

Website User and Social Media

Platforms Personal data processed:

| Purposes | Types of individuals | Types of personal data | Retention period | Lawful basis |
|---|---|---|-------------------------------|---|
| Collect analytics to understand user numbers accessing website, registering interest for our research | All individuals access social media platforms that click on our adverts | IP address, device address, time of day, length of time, what screens are visited | We keep your data for 8 years | Providing you or planning for healthcare services in our 'legitimate interest' [Article 6(1) (f)] |



For website users and social media platforms, where we rely on GDPR Article 6(1)(f) our legitimate interests are as follows:

1. Marketing our products, services and research.

Information Requests

Under the General Data Protection Regulation (GDPR) and Data Protection Act, individuals have the right to access the information we hold about them, both on paper and electronically. There are some exceptions to this however, which include:

- 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.
- The information is considered to have the potential to cause mental or physical harm to the individual or someone else.

Please note we will require proof of identity before we can disclose personal information.