



Home Health UK

Data Protection Policy

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Preamble

Home Health UK is the UK's leading provider of diagnostic test kits such as blood glucose meters, home health testing kits and veterinary tests. Home Health UK is committed to conducting its business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct.

This policy sets forth the expected behaviours of Home Health UK employees and third parties in relation to the collection, use, retention, transfer, disclosure and destruction of any Personal Data belonging to Home Health UK.

Personal Data is defined by the Information Commissioner's Office as "any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people."

Data is subject to legal safeguards and further legal regulation which restricts how organisations may process it. An organisation that handles Personal Data and makes decisions about its use is known as a Data Controller. Home Health UK, as a Data Controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this policy. Non-compliance may lead to complaints, regulatory action, fines and/or reputational damage.

Home Health UK management is committed to the full implementation of this policy and compliance to all laws in this area and demands that all employees and third parties share in this commitment. Any breach is taken extremely seriously and may result in further action being taken.

This policy has been approved by Home Health UK's senior management team and was reviewed on 20/3/18.

The Policy

Home Health UK is registered under the Data Protection Act 1998.

General Statement of Home Health UK's Duties and Scope

Home Health UK is required to process relevant personal data regarding members of staff, applicants and customers as part of its operation and shall take all reasonable steps to do so in accordance with this policy.

This policy applies to all Home Health UK's business activities where a Data Subject's personal data is processed, including but not exclusively;

- In the context of the business activities of Home Health UK.
- For the provision or offer of goods or services to individuals (including those provided or offered free-of-charge) by Home Health UK.
- To actively monitor the behaviour of individuals. Monitoring the behaviour of individuals includes using data processing techniques such as persistent web browser cookies or dynamic IP address tracking to profile an individual with a view to:
 - Taking a decision about them.
 - Analysing or predicting their personal preferences , behaviours and attitudes.

This policy refers to all processing of personal data in electronic form, including email and other documents created using software.

This policy aims to create a baseline for the expected standards for Home Health UK. Where national law is stricter than this policy then the relevant legislation should be adhered to. Where there is a conflict, advice from the ICO should be sought.

Principles

Home Health UK adheres to the principles of both the current UK Data Protection Act 1998 and the European General Data Protection Regulation 2016 and is actively working towards compliance with that directive. In accordance with these principles personal data shall be:

Data Protection Act 1998	General Data Protection Regulations 2016
Processed fairly and lawfully	Processed lawfully, fairly and in a transparent manner in relation to individuals.
Processed for specified purposes only	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.
Adequate, relevant and not excessive	Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
Accurate and up to date	Accurate and, where necessary, kept up to date; whilst having regard to the purposes for which data is processed, every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay.
Not kept longer than necessary	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.
Processed in accordance with data subjects' rights	GDPR does not contain a specific principle relating to individuals' rights - these are specifically addressed in separate articles (see GDPR Chapter III - https://gdpr-info.eu/chapter-3/).
Processed and held securely	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.
Not transferred outside the countries of the European Economic Area with adequate protection	GDPR does not contain a specific principle relating to overseas transfers of personal data - these are specifically addressed in separate articles (see GDPR Chapter V - https://gdpr-info.eu/chapter-5/).

In addition the GDPR introduces an 'accountability' principle, this ensures that Data Controllers (Home Health UK) are responsible for, and can demonstrate and verify their compliance with personal data legislation through the DPO.

Roles and Responsibilities

All

Home Health UK expects all its members of staff and third parties to comply fully with its Data Protection Policy and the law.

Staff

Staff are responsible for:

- ensuring that all the personal data Home Health UK holds about them in connection with their employment is accurate and up to date;
- informing Home Health UK of any changes or errors to information which they have provided immediately, e.g. change of address;
- ensuring, where they process personal data in connection with their employment and are permitted to do so, that any personal data processed is kept securely and is not disclosed either orally or in writing to any unauthorised third party;
- informing the Data Protection Officer (mark.hanson@homehealth-uk.com) if they process personal data for a new purpose, transfer personal data to a new data processor or undertake any significant changes to the management or handling of personal data.

Where any of the above activities are to be undertaken a Privacy Impact Assessment (PIA) of this new, or additional processing, must be completed to ensure compliance with data legislation prior to the processing of the personal data. The PIA form and associated notes are included in the appendix of this document.

As part of the PIA, staff need to provide full details of the type of personal data to be processed (i.e. financial details, contact details, etc.), who the subject of the data is (customers, employees, third parties etc.), why the data is being processed (marketing, staff administration, new sales process) and whether the intention is at any time to transfer the data to a third party external to Home Health UK who is not the subject of the data, including whether this is an international partner.

Anyone responsible for creating or maintaining web pages should note that the Home Health UK Policy and the provisions of data protection legislation will relate to any personal data about individuals that may be held on web pages or accessed via them.

Other

This category includes other stakeholders, contractors, visitors, etc. who provide personal data to Home Health UK or process personal data on behalf of Home Health UK (third parties) which must also comply with Home Health Policy and the law.

Specific Officers

Senior Management Team

The Senior Management Team are committed to continual improvement of the data protection management system and oversight of staff with regards to Data Protection.

Data Protection officer

Home Health UK has appointed the Operations Director as the Data Protection Officer (DPO) who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998 and the GDPR Regulations 2016.

Processing of Personal Data

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract undertaken with Home Health UK. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent.

In some cases specific partner organisations may publish a detailed privacy policy relating to their services, for example:- i-GP <https://i-gp.uk/terms-and-conditions/privacy-policy> and PayPal <https://www.paypal.com/en/webapps/mpp/ua/privacy-full>. Users of those services indicates acceptance and may grant additional consent as to how Home Health UK may process personal data. It should be noted that All PayPal transactions are subject to the PayPal Privacy Policy. Under the terms of this policy we must employ reasonable administrative, technical and physical measures to maintain the security and confidentiality of any and all PayPal data and information, including data and information about PayPal users and PayPal.

Home Health UK processes some personal data for direct marketing purposes, data subjects have the right to request an opt-out to these activities, which must be respected.

Sensitive Personal Data

Home Health UK may, from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings.

Rights of Access to Information

Data subjects have the right of access to information held by Home Health UK, subject to the provisions of the Data Protection Act 1998. These rights have been expanded under the General Data Protection Regulation and are referenced in the Data Protection Guidelines.

<https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/individuals-rights/>

Home Health UK is committed to the management of such requests and any individual wishing to obtain personal information about themselves must contact the Data Protection Officer at mark.hanson@homehealth-uk.com. Home Health UK will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event, within 40 days for access to records and 21 days to provide a reply to an access to information request. The information will be imparted to the data subject as soon as is reasonably possible after it has come to Home Health UK's attention and in compliance with the relevant legislation. No fee will be charged for this as per the relevant legislation.

Exemptions

Certain data is exempted from the provisions of the Data Protection Act 1998 which includes the following: -

- National security and the prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon Home Health UK.

Any further information on exemptions should be sought from the DPO.

Accuracy

Home Health UK will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

Enforcement

If an individual believes that Home Health UK has not complied with this policy or acted otherwise than in accordance with the Data Protection Act 1998, the member of staff should notify the DPO.

Data Security

Home Health UK will take appropriate technical and organisational steps to ensure the security of personal data. This is done through our technology partners and all staff will be made aware of this policy and their duties under the Act.

Home Health UK and all staff and third parties are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data. An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be encrypted when transported offsite.

Retention of Data

Home Health UK may retain data for differing periods of time for different purposes as required by statute or best practices. Further information on these can be sort through the DPO.

Privacy statement

Where personal data is being initially collected or used for a further purpose(s) then data subjects need to be informed through a Privacy (also known as a Fair Processing) Notice (see the Privacy Policy for further details), as to how their personal data will be used by Home Health UK.

Privacy Impact Assessments