

# NCD QM

# Privacy Policy of ncdqm.tk

## Privacy Policy

Effective date: November 06, 2018

NCD QM ("us", "we", or "our") operates the ncdqm.tk website and the NCD QM mobile application (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. Our Privacy Policy for NCD QM is managed through [Free Privacy Policy](#).

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

## Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

### Types of Data Collected

#### Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

## Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

## Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

## Use of Data

NCD QM uses the collected data for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

## Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside KENYA and choose to provide information to us, please note that we transfer the data, including Personal Data, to KENYA and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

NCD QM will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

# Disclosure Of Data

## Legal Requirements

NCD QM may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of NCD QM
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## Security Of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [ncdqms@gmail.com](mailto:ncdqms@gmail.com)

# **Health Care Provider Protection and Confidentiality Statement**

## **1. Preamble**

Data Protection and Confidentiality Policy is a set of rules and guidelines that will apply users of the Nairobi County Non Communicable Diseases Quality Management Health information system (NCD QM system) established and maintained by the County Health Management Team. The system will store patients' health information obtained by a health provider. The users will be agreeing to complying with the requirements of the Health Act 2017 and other legislative provisions on protection of Patient Health Information.

## **2. Scope**

The policy applies to the staff in the public, private and faith based healthcare facilities, sub county and county. It also applies to all contractors, agents, and others acting on behalf of the healthcare providers, sub county and county staff who have access to any personal and/or confidential information held by or on behalf of the healthcare facilities.

## **3. Purpose**

The policy sets out our commitment to and procedures for protecting personal information and for dealing with confidential information. The objectives of this policy are to:

- Put in place effective measures to ensure appropriate records are kept.
- Meet our legal obligations under the Health Act 2017 and other legislation.
- Prevent inappropriate use of information held by us.
- Prevent harm to individuals whose information is held by us.
- Demonstrate good data protection management, respect for confidentiality and meet relevant quality assurance systems

## **4. Legislation**

The Health Act 2017, and Kenya National E-Health Policy 2016-2030 give specific guidance on how patient health information should be dealt with. To comply with the law personal information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

All staff should:

- Ensure that all information concerning a patient including information relating to his/her health status, treatment or stay in a health facility remains confidential.
- Ensure that all patient health records containing problems, medication list, test and examination results, procedures and management plans are synchronized with the Central Registry (CR).
- Ensure that they only view client-health-information specific to the care they are giving.

However, there are exceptions to the above provisions:

- Where the confidential information is disclosed under a court order.
- Informed consent of the patient.
- If the information is necessary for health research and policy planning purposes.
- Where non-disclosure of the information represents a serious threat to public health.

## **5. Responsibilities**

All staff, along with contractors, agents, and others acting on behalf of the healthcare providers, sub county and county staff are to be made fully aware of this Policy and of their duties, responsibilities and contractual obligations under the Act.

All staff of the Health Facility, sub county and county will be required to sign a Confidentiality Statement before the Nairobi County Non Communicable Diseases Quality Management Health information system is implemented.

**Please read this statement carefully. Be sure to ask County Health Management Team for clarification about anything you don't understand, before signing this Agreement. Refusal to sign this Agreement will result in immediate denial of access to Department of Health records and could result in the termination of a contract.**

**Everyone who has access to Department medical and personal records is required by law to safeguard the confidentiality of personal health and other information contained in these records. Unauthorized disclosure of Confidential Information is a violation of Section 11 (1) of the Health Act, subject to civil and/or criminal prosecution, penalties, forfeitures and legal action. Former employees of the Health Care Provider, too, must continue to comply with confidentiality requirements after leaving employment with the Health Care Provider.**

**Nairobi County Non Communicable Diseases Quality Management Health information system (NCD QM system) will be established and maintained by the County Health Management Team in accordance with the following terms and conditions:**

1. Health Care Providers acknowledge that they and their employees and agents have been provided with access to Department of Health information that must be held in the strictest confidence, and agree that they shall continue to hold these data in the strictest confidence, except as provided herein.
2. Health Care Providers shall request data as needed for patient care or public health purposes.
3. Each Health Care Provider agrees that no agent, employee, or other individual to whom she or he provides information obtained from the Department shall attempt to contact any person who is the subject of any record except for patient care or public health purposes.
4. Each Health Care Provider agrees that none of his or her agents, employees or any other individuals to whom information obtained from Department records is provided shall at any time disclose the contents of ANY record, report or other data provided by a patient including, but not limited to, personal identifying information of any individual in the Nairobi County Non Communicable Diseases Quality Management Health information system (NCD QM system) database, except for patient care or public health purposes.
5. Each Health Care Provider acknowledges that all data given by a patient shall remain the property of the County Health Management Team.
6. Neither the Health Care Providers nor any of their agents or employees shall compile any aggregate data or statistics from the Nairobi County Non Communicable Diseases Quality Management Health information system (NCD QM) system database, nor publish any reports, based upon, or which are the results or analyses of NCD QM system data or records, in any medium of communication, or repackage any identifiable NCD QM system data for offer or sale to or use by any other prospective purchaser.
7. The terms of this or any other agreement between the Health Care Provider and any entity requiring the Providers to maintain the confidentiality of NCD QM system data shall survive the expiration of the procurement.
8. The Health Care Providers shall provide each of their agents, employees, or vendors having access to NCD QM system data with a copy of this agreement and require that each such person or entity understand and individually agree to comply with all applicable terms and conditions.



9. Should the person signing this agreement leave their position the entity agrees to notify the County Health Management Team as to who the replacement will be and a new agreement will be signed by the person taking over the duties

## **AGREEMENT**

..... has read and understand the above statement..... agrees to keep strictly confidential all confidential information received from the records of the Department of Health..... understands fully the consequences if confidential information is disclosed without proper authorization..... discussed, and will continue to discuss, with County Health Management Team personnel any questions about what is confidential or to whom confidential information may be revealed.

DATED: .....

PRINT NAME: ..... SIGNATURE:

.....

ADDRESS: ..... JOB TITLE:

.....

E-MAIL: ..... PHONE: .....