

Policy Privacy

SARM **System Appointment and Resource Management**

1. Introduction

At System Appointment and Resource Management (SARM), your privacy is the main meaning to us, and we are fully committed to protecting your personal information. This Privacy Policy outlines how we collect, use, store, and safeguard the data you provide while interacting with our website and services in compliance with the **General Data Protection Regulation (GDPR)** (EU Regulation 2016/679).

We believe in transparency and are dedicated to giving you control over your personal data. This policy explains our practices and ensures that you understand your rights under the GDPR, including the rights to access, rectify, or erase your data, as well as object to or restrict its processing. By using our services, you agree to the practices outlined in this policy.

This Privacy Policy applies to all visitors, users, and customers of SARM, whether accessing our services via websites, mobile applications, or other platforms.

Your trust is vital to us, and we are committed to ensuring that your data is processed lawfully, fairly, and transparently. Please take a moment to review this Privacy Policy in full to understand how we protect your personal information while adhering to the highest standards of data protection, as required by the GDPR and other relevant regulations.

2. What is Personal Data and What Categories of Data Do We Process?

The **General Data Protection Regulation (GDPR)** provides a comprehensive definition of **personal data**. Personal data refers to any information that can identify an individual, either directly or indirectly. This can include a wide variety of data, irrespective of the format in which it is presented—whether it is in writing, electronic form, or any other medium.

At System Appointment and Resource Management, we process several categories of personal data to deliver our services effectively and maintain a secure experience for our users. Below are the main categories of personal data that we collect and process:

a. Patient Information

This category includes all information related to a patient's identity and contact details, such as:

- Full Name
- Email Address
- Gender
- Date of Birth
- Phone Number
- Residential Address
- Emergency Contact Details

b. Medical Record

We process sensitive health-related information, which is crucial for providing healthcare services and treatment. This category includes:

- Allergies
- Medical Conditions (e.g., chronic illnesses, prior surgeries)
- Appointment History (dates, treatments, and procedures previously undergone)

We treat all personal data with the best care and join to all relevant data protection laws to ensure your privacy is respected. The personal data we collect is used exclusively for providing and improving our services.

3. Who is Responsible for Processing Your Personal Data?

At SARM, we are committed to ensuring the security and privacy of your personal data. As the data controller, we are responsible for processing the personal data of our users in accordance with applicable data protection laws.

If you have any questions, concerns, or requests regarding the processing of your personal data, or if you would like to exercise any of your data protection rights, please do not hesitate to reach out to us.

You can contact us via the following methods:

- **Email:** contact@example.com
- **Phone Number:** +1 (555) 123-4567

For additional updates, inquiries, or to stay connected with us, you can also follow us on our social media channels:

- [Facebook](#)
- [X/Twitter](#)
- [Instagram](#)
- [LinkedIn](#)
- [YouTube](#)

4. In What Situations Do We Process Your Personal Data?

We process your personal data in a variety of situations to ensure we provide the best possible service and comply with relevant legal and regulatory requirements. Below are the main situations in which we process your personal data:

a. Storage of Personal Data

We store your personal data in a secure and encrypted format within our database to ensure it is readily accessible when needed. This allows us to provide you with an easy and efficient service, whether you are interacting with our platform, scheduling appointments, or requesting support. The storage of personal data enables us to maintain your records securely while ensuring data integrity over time.

b. Data Query

Your personal and medical data is accessible to you and authorized professionals to enable efficient and accurate service delivery. This allows healthcare providers and staff to consult your medical record and contact information as necessary for treatments, follow-ups, and medical advice. By providing timely access to this data, we help ensure that your care is well-coordinated, and we can respond swiftly to any healthcare-related needs.

c. Update of Personal Data

To ensure the accuracy of the data we hold, we allow both you and our administrators to update personal information, including administrative data and medical records. You can update your contact information, medical history, and other personal details. This helps us keep your records up to date, which is crucial for maintaining the quality of service, minimizing errors, and facilitating informed decision-making.

5. For What Purposes Do We Process Your Personal Data?

We process your personal data for several specific purposes to provide you with our services, comply with legal requirements, and ensure the protection of your data. Below is an outline of the personal data we process, along with the corresponding purposes for each data type.

a. Name

- **Account Creation**

Your name is used to validate your identity and register you in our system during the account creation process. This helps us provide personalized services and ensure the integrity of your account.

- **Presentation**

Your name is used to any interaction between a health professional and you, ensuring you have access to your personalized data and services.

b. Email

- **Account Creation**

We use your email to validate your identity during account creation and to send you confirmation messages or updates related to your account.

- **Account Presentation**

Your email address is essential for presenting and identifying your account within our system. It helps us manage your profile and provides a secure means of communication.

- **Sensitive Data Change Notification**

If there is a change to your sensitive data (such as email and phone number), we use your email to notify you about the update and ensure you are informed of any important changes.

- **Two-Step Verification**

We use your email as part of a two-step verification process to enhance security. This is triggered when you create an account, update details, or delete your account.

c. Phone Number

- **Account Creation**

Your phone number is used to verify your identity during account creation, ensuring your contact information is correct and providing an additional layer of communication.

d. Residential Address

- **Emergency Response**

We store your residential address to ensure that, in the case of an emergency, ambulances or emergency service can quickly be dispatched to your location, providing you with the necessary assistance in urgent situations.

e. Emergency Contact

- **Service Delivery**

We store your emergency contact details for use in case of urgent situations. These contacts will be reached if immediate action is needed regarding your health or personal safety.

f. Gender

- **Audits and Service Improvements**

We use your gender as part of anonymous surveys to evaluate our service delivery and ensure that we are meeting the diverse needs of all patients.

- **Customized Healthcare Services**

Your gender is used to personalize your healthcare services, ensuring that specific health screenings, treatments, and recommendations are made according to your gender-related needs.

g. Date of Birth

- **Audits and Service Improvements**

Your date of birth is used to analyse trends in our healthcare services and conduct demographic assessments. This helps us refine our service offerings and better serve our patient population.

- **Age-appropriate Healthcare**

Your date of birth helps us provide age-appropriate healthcare services, ensuring that treatments, screenings, and other medical services align with your age group's health needs.

h. Allergies

- **Scheduling Surgeries**

We process your allergy information to ensure the necessary precautions are taken during surgery scheduling. By considering your allergies, we can allocate the appropriate medical staff, equipment, and treatments to ensure your safety.

- **Audits and Service Improvements**

Your anonymized allergy data is used for internal audits and to conduct surveys aimed at improving the quality of our healthcare services.

i. Medical Conditions

- **Scheduling Surgeries**

We process your medical conditions to determine the best possible time and resources for your surgery. This ensures that the required medical staff, equipment, and preparations are aligned with your specific needs, offering tailored care.

- **Personalized Healthcare**

We process your medical conditions to ensure that treatments and care plans are customized to your specific health needs, providing you with the most effective healthcare solutions.

- **Audits and Service Improvements**

Your anonymized medical condition data is used for internal audits and to conduct surveys aimed at improving the quality of our healthcare services.

j. Appointment History

- **Scheduling Surgeries**

We process your appointment history to assess your past treatments and medical procedures, ensuring that the scheduling of surgeries is done in a way that considers your previous medical experiences and appointments.

- **Healthcare Continuity**

We track your appointment history to maintain an accurate record of your past consultations and treatments. This helps us monitor your healthcare journey and ensures that future appointments are scheduled appropriately based on your previous treatments.

- **Audits and Service Improvements**

Your anonymized appointment history is used for internal audits and to conduct surveys aimed at improving the quality of our healthcare services.

6. How Do We Process Your Personal Data?

We process your personal data in accordance with legal standards and for the purpose of providing quality services. The processing of your data occurs under several specific circumstances that ensure we comply with relevant laws and regulations while prioritizing your safety and privacy. Below are the various grounds under which we process your personal data:

a. Consent

We obtain your explicit consent before processing your personal data for specific purposes. By consenting, you allow us to process your data to deliver personalized services, send notifications, or manage healthcare appointments. You have the right to accept and withdraw your consent at any time and at any purpose, and such acceptance or withdrawal will not affect the legality of the data processing prior to the withdrawal.

b. Compliance with a Legal Obligation

We process your personal data to comply with mandatory legal obligations. This includes requirements related to healthcare regulations, national health laws, or other legal requirements that demand the collection, storage, and sharing of certain personal data. Processing your personal data in this context ensures that you receive timely medical care, that we report health data when required, and that we maintain compliance with relevant healthcare laws.

c. Legitimate Interest

In certain circumstances, we may process your personal data without your explicit consent if we believe it is necessary to protect our legitimate interests or the interests of third parties. For example, if there is a medical malpractice lawsuit, we may process your medical records to defend against the claim. This processing will only be done when the legitimate interest outweighs your privacy rights, and we take steps to minimize any impact on your privacy.

d. Vital Interest

In emergency situations, we process your personal data to protect your vital interests, particularly when urgent medical attention is required. For instance, if you are in a medical emergency, we may need to access your information, allergies, medical conditions and appointment history to ensure that appropriate and immediate medical care is provided. This is done to protect your life and well-being when your health is at risk.

e. Healthcare Provision

You provide sensitive data as part of your gender, date of birth, medical conditions and allergies to help us deliver tailored healthcare services. We process your personal data to ensure that surgeries and treatments are scheduled in line with your clinical condition, medical requirements, and history. This allows us to provide you with the most suitable medical care and to make informed decisions about your treatment plan.

7. How Long Do We Keep Your Personal Data?

We are committed to ensuring that your personal data is stored only for as long as necessary to fill the purposes for which it was collected and to comply with legal obligations. The retention period for personal data is determined by legal, regulatory, and operational requirements. Below are the key aspects of how long we retain your personal data:

a. Retention Period for Patient Data

We retain your personal and medical data for a period of **6 years**, in compliance with the legal requirements set by the National Health System. During this time, your data is securely stored and protected, ensuring it is accessible for ongoing care, treatment, and maintaining a complete medical history. This retention period also allows us to comply with healthcare laws and regulations.

b. Request for Data Deletion

If you make a request for the deletion of your personal data, we will take prompt action to remove or anonymize the data within **30 days** after receiving the request. We understand the importance of your privacy, and we will ensure that any data that is no longer needed for operational, legal, or medical purposes is effectively deleted or anonymized.

c. Permanent Deletion or Anonymization

After the expiration of the retention period or following the completion of a data deletion request, all personal data will be permanently deleted or anonymized. This means that the data will be irreversibly removed from our systems, ensuring that no further processing can occur.

d. Retention for Legal or Contractual Purposes

In some cases, we may need to retain specific personal data to meet legal or contractual obligations. However, all identifiable information about you will be securely removed, ensuring your privacy is protected.

e. Anonymized Data for Research and Statistical Purposes

Some of your data may be retained for research, statistical analysis, or healthcare improvement purposes. In these cases, we will anonymize the data so that it no longer identifies you as an individual. Anonymized data helps us improve services and conduct important research without compromising your privacy.

8. To Whom Do We Transmit Your Personal Data?

We understand the importance of safeguarding your personal data. However, in order to provide the best possible care and ensure compliance with legal obligations, we may need to transmit your personal data to certain third parties. Below are the key recipients of your personal data:

a. National Health System (SNS)

We transmit your personal data to the **National Health System** as required by law. This transmission is necessary for ensuring compliance with healthcare regulations and for enabling timely access to medical services. Your data may be shared with relevant SNS authorities to maintain your medical record, facilitate coordination of care, and ensure that healthcare providers have the necessary information to treat you.

b. Healthcare Providers and Medical Professionals

Your personal and medical data may be shared with healthcare providers and medical professionals involved in your treatment or care. This includes specialists, surgeons, general practitioners, nurses, and other healthcare professionals who need access to your medical history, allergies, medical conditions, and other relevant data to provide you with appropriate care.

c. Emergency Services

In case of an emergency, we may transmit your personal and medical data to emergency services, including paramedics and ambulance teams, to ensure that the appropriate medical interventions are provided swiftly. This may include sharing your allergies, medical conditions, and any other information critical to your treatment in urgent situations.

d. Regulatory Authorities

As part of our compliance with healthcare regulations, we may transmit your personal data to regulatory authorities, including government agencies or public health organizations, if required. This ensures that we meet national healthcare laws, including reporting requirements for specific medical treatments or conditions.

9. What Are Your Personal Data Protection Rights and How Can You Exercise Them?

You have the following rights regarding your personal data, which you can exercise under applicable data protection laws, such as the General Data Protection Regulation (GDPR). These rights allow you to control how your data is handled, and we are committed to facilitating their exercise.

a. Access

You have the right to access your personal data and obtain information about how it is being processed. This allows you to understand the types of personal data we hold, the purposes of processing, and the recipients of the data. You can request a copy of the personal data we hold about you.

b. Rectification

You have the right to request the correction of any inaccurate or incomplete personal data. If you believe any information, we hold is incorrect or outdated, you can request its update to ensure your personal records are accurate.

c. Erasure

You have the right to request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected, or if you withdraw your consent for processing, provided there are no overriding legitimate grounds for retaining it. This is commonly referred to as the "right to be forgotten."

d. Restriction

You have the right to request that we restrict the processing of your personal data under certain circumstances. This right allows you to limit how we use your data, for instance, while you contest its accuracy or when you believe the processing is unlawful but prefer to restrict rather than erase the data.

e. Portability

You have the right to receive your personal data in a structured, commonly used, and machine-readable format. Additionally, you have the right to transmit your data to another controller, where technically feasible. This allows you to move, copy, or transfer your personal data easily from one system to another.

f. Objection

You have the right to object to the processing of your personal data, especially if it is based on legitimate interests or public tasks. You may exercise this right if you feel that your fundamental rights and freedoms violates our legitimate interests in processing your data.

g. Automated Decision-Making

You have the right not to be subject to decisions based solely on automated processing, including profiling, which have legal effects on you or significantly affect you. This includes decisions that result in significant consequences, such as automated rejection of an application.

h. Withdrawal of Consent

You have the right to withdraw your consent at any time if we rely on consent as the legal basis for processing your data. Withdrawing consent will not affect the lawfulness of any processing we carried out based on your consent before its withdrawal. You can withdraw consent easily by contacting us.

i. Lodging a Complaint

If you believe that your rights have been violated or that we are processing your data unlawfully, you have the right to lodge a complaint with a supervisory authority. This could be the data protection authority in your country or region, who can investigate the issue on your behalf.

j. Exercising Your Rights

You can exercise any of your data protection rights by contacting us directly through the contact details provided. We will respond to your request as promptly as possible and in accordance with legal requirements.

10. Conclusion

We are committed to safeguarding your personal data and respecting your privacy. This Privacy Policy outlines the ways we collect, process, store, and protect your information while ensuring transparency in our practices. By using our services, you acknowledge that you have read and understood the terms outlined here.

If you have any questions, concerns, or would like to exercise your data protection rights, please do not hesitate to contact us through the details provided. We are here to address your concerns and ensure that your data is handled in accordance with applicable laws and our commitment to privacy.

Thank you for trusting us with your personal data. We provide you with the highest standard of care and protection.