

The Renal Association

PatientView

Data Protection Privacy Notice

Introduction

This page explains why information is collected about you and how your information may be used - this is called a Fair Processing Notice or Privacy Notice. This privacy notice applies to the information of patients using PatientView and describes how PatientView collects, uses and processes your personal information and how, in doing so, it complies with its legal obligations to patients. Your privacy is important and PatientView is committed to safeguarding your data privacy rights.

The General Data Protection Regulation (GDPR) became law on 24th May 2016. This is a single EU-wide regulation on the protection of confidential and sensitive information. It enters into force in the UK on the 25th May 2018, repealing the Data Protection Act (1998).

This notice will address the following areas:

- Key definitions
- Why we collect your information
- How your information is used
- Who your information is shared with
- The lawful basis for collecting your information
- How PatientView maintains the confidentiality of your records
- PatientView and partner organisations
- How long your information will be stored
- Your individual rights
- Objections and complaints
- How to contact PatientView
- Changes to this notice

Key definitions

Data controller – person or persons who determine the purposes and means of processing personal data, in this case, the unit/hospital where you receive treatment.

Data processor – in relation to your personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller, for example, PatientView process your data on behalf of the unit/hospital where you receive treatment.

Data protection officer – an existing employee or externally appointed person in place to assist in monitoring internal compliance, informing and advising on data protection

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obligations, providing advice regarding Data Protection Impact Assessments (DPIAs) and acting as a contact point for data subjects and the supervisory authority.

Why we collect your information

PatientView allows you to view your latest test results, letters from clinicians and medicines you are prescribed by clinicians treating you. You can also view information about your diagnosis and its treatment.

How your information is used

PatientView is processing your personal data and is a 'Data Processor'. The unit/hospital where you are treated sends PatientView a file with your results, letters and medications and PatientView makes the information available for you to view when you sign on to the PatientView website.

Who your information is shared with

PatientView only shares information with you, the patient, and with your GP to support your healthcare needs.

We will also share information as required by law, for example, to comply with a court order.

The lawful basis for collecting your information

When you signed on to PatientView, you completed a consent form agreeing to have your information sent to and displayed in PatientView. Under the GDPR, PatientView will be lawfully using your information in accordance with:

Article 6(1)(a) The data subject has given consent to the processing of their personal data for one or more specific purposes.

How PatientView maintains the confidentiality of your records

PatientView is committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act (2018)
- General Data Protection Regulation (2016)
- Human Rights Act (1998)
- Common Law Duty of Confidentiality
- NHS Codes of Confidentiality, Information Security and Records Management.

We will not disclose your information to third parties without your consent unless there are exceptional circumstances such as situations when the health and safety of others is at risk,

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or where the law permits information to be passed on. Anyone who receives information from us is also under a legal duty to keep it confidential.

All employees working on PatientView are asked to sign a confidentiality agreement as part of the employment contract. If a sub-contractor acts as a data processor for PatientView an appropriate contract will be established for the processing of your information.

PatientView and partner organisations

PatientView was developed through an initiative from The Renal Association. The Renal Association is the leading professional body for the UK Kidney community, dedicated to improving services and outcomes for patients and families through education, research and training for prevention and effective treatment of kidney disease. You can find out more about The Renal Association here <https://renal.org/about-the-renal-association/>

A steering group manages PatientView and reports to The Renal Association, its formal home. Solid State Group (<https://www.solidstategroup.com/>) is a sub-processor for PatientView and works on the development of the PatientView software.

How long your information will be stored

PatientView displays a record of a patient's test results, clinical letters and medications. Your information is displayed on PatientView for as long as you want to view your results.

PatientView can securely and permanently dispose of all your information on PatientView if you request your data to be deleted – see the section below about 'Your individual rights'.

Your individual rights

This next section describes how you can access, amend, erase, and move your personal data, withdraw your consent and object to or complain about the data that PatientView holds on you.

Right to access your data (data subject access requests)

You have the right to see or have a copy of your personal information on PatientView without any charge. If you want to access your information on PatientView, you should make a written request to PatientView – see the section below on 'How to contact PatientView'. We will normally provide your information within one month of receiving all the information we need to respond to your request.

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Right to rectification (right to amend your data)

You have the right to have your information amended. Please contact the unit/hospital treating you if you want information on PatientView corrected. The unit/hospital treating you regularly sends your information to PatientView for display and information should be corrected on the unit/hospital records. A corrected file will then be sent to PatientView by your unit/hospital.

Right to have your information erased

You can request in writing to have your information on PatientView erased. We will respond to your request within one month. Because our lawful basis for processing your data is patient consent, we will delete your PatientView account and erase all your information from PatientView when you withdraw your consent to view your information on PatientView. You can contact your unit/hospital or PatientView directly when you want to have your information erased from PatientView. Please see the section 'How to contact PatientView' for our contact details.

Right of data portability (right to move your data)

You have the right to request a secure transfer of your data from PatientView to another data controller. PatientView will transfer your data to your unit / hospital (the data controller) for them to transfer on to the new data controller. You should make the request in writing to PatientView - see the section 'How to contact PatientView' for our contact details. No fee will be payable and the information will be transferred within one month.

Right to object

PatientView uses your information for the purpose you consented to. If you do not agree with this you have the right to object. See the section below on 'Objections and complaints' that explains who to contact if you have an objection. PatientView will respond to your objection within a month (although we may be allowed to extend this period in certain cases).

Right to withdraw consent

You consented at the unit/hospital treating you to view your information on PatientView. You have the right to withdraw your consent at any time by letting the unit/hospital treating you know or by contacting PatientView - see the section 'How to contact PatientView' for our contact details. If you withdraw your consent your PatientView account and your information on PatientView will be securely deleted.

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Right to complain to the regulator

Details on how you can do this are included in the section 'Objections and complaints'.

Objections and complaints

Should you have any concerns about how your information is managed, please contact the data protection officer for PatientView (see section below 'How to contact PatientView'). If you are still unhappy following a review by the data protection officer, you have a right to lodge a complaint with the Information Commissioner:

Information Commissioner:
Wycliffe house
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 01625 545745
www.informationcommissioner.gov.uk

How to contact PatientView

Our address for communications is:

PatientView
C/o The Renal Association
Learning and Research Building
Southmead Hospital
Bristol
BS10 5NB

Our telephone number is 0117-414-8152

Our email-address is: nbn-tr.patientview@nhs.net

PatientView are registered to process personal and sensitive information under the Freedom of Information Act 2000 - our registration number is Z8674100

Our Caldicott Guardian (senior person responsible for sharing of patient information) is Dr Fergus Caskey. Dr Caskey can be contacted via email at fergus.caskey@bristol.ac.uk.

The Responsible Officer for PatientView is Mr Ron Cullen and he can be contacted via email at Ron.Cullen@renalregistry.nhs.uk.

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The Renal Association lead and chair of PatientView is Dr Afzal Chaudhry and he can be contacted at anc35@cam.ac.uk.

Our Senior Information Risk Owner (SIRO) is Dr Retha Steenkamp. She can be contacted via email at Retha.Steenkamp@renalregistry.nhs.uk.

Our data protection officer is Mr Curtiss Green, GR Governance & Consultancy Service. He can be contacted at curtiss@grgserv.co.uk. The postal address for the data protection officer is: C/o The Renal Association, Learning and Research Building, Southmead Hospital, Bristol, BS10 5NB

Please note that emails sent to the above addresses will not be secure in transit.

Changes to this notice

We may amend this privacy notice from time to time. If you are dissatisfied with any aspect of our privacy notice, please contact the data protection officer.