

HGL General Data Protection Regulations (GDPR) FAQs

Purpose

The purpose of this document is to provide customers with details of frequently asked questions in relation to Healthcare Gateway and the new General Data Protection Regulations that come into force in May 2018

No.	Question	Answer
1	'What processes do HGL have in place to achieve GDPR compliance in time for the deadline?	HGL are going through series of training and awareness sessions with all staff to ensure they are fully informed of the changes, each responsible department will be reviewing processes in line with the changes in legislation.
2	Do HGL have a dedicated security team?	HGL are ISO 27001 certified and such have a security officer along with all employees having security awareness. Security forums are held on a regular basis.
3	'What is HGLs security strategy and how is it prioritized?	HGL ISO 27001 certified and a regularly audited internally and externally
4	Do HGL have a information and security policy?	Yes, HGL security policy can be found on our website http://healthcaregateway.co.uk/wp-content/uploads/2017/01/HGLPD5-Information-Security-Policy.pdf
5	Does HGL have a privacy policy for customer data?	HGL privacy policy can be found on our website http://healthcaregateway.co.uk/about/privacy-policy/
6	For how long do you store PID data?	Incoming Patient Identifiable Data (PID) is retained for 60 days. After 60 days all PID is removed. PID retained by the MIG; Title Forename(s) Surname

		<p>DOB Gender All address fields NHS Number This is date specific and not associated to time. The 60 days includes weekends and bank holidays. All non-patient identifiable data is retained for 5 years</p>
7	What process do you have in place to notify customers or prospects when the intended use of their data changes?	As per our data protection policy all customers will be fully informed regarding changes to our services and how this may affect the use of their data following PIA and Hazard risk assessments
8	How do you obtain and document expressed permission to store people's personal data?	http://healthcaregateway.co.uk/about/privacy-policy/
9	Do you have an appointed Data Protection Officer?	A Data Protection Officer (DPO) will be appointed prior to the change in legislation.
10	Do your systems undergo regular penetration testing?	Yes
11	What are your access control policies for both customer and internal data?	This is an ISO27001 security requirement, HGL have an access control policy that details the access controls to databases, data and systems used by Healthcare Gateway Ltd
12	Where is the data physically stored?	Hosted environment which is ISO 20000 & ISO27001 accredited
13	Who has access to your data facilities?	ISO27001 certified service provider for our hosting facilities, all employees have been security checked and have confidentiality clauses within their contracts.
14	What is your formal procedure for reporting out on data leaks?	Reporting any leaks to ICO as per Reporting Security Incident reporting procedure
15	What internal processes do you have for taking action in the event of a security violation?	Internal security incident reporting procedure in compliance with ISO 27001
16	How does your organization handle instances when customers or prospects request their data be removed from your system(s)?	HGL follow their Internal Subject Access Requests procedure which is in compliance with General Data Protection Regulation.

17	What third party organizations do you work with that may also have access to the data we share with you?	"None" or only those organisations that have legitimate sharing agreements in place to view the data. To be clear, no data is shared with Healthcare Gateway but via Healthcare Gateway. Data is shared using the Medical Interoperability Gateway between health and social care organisations providing legitimate sharing agreements are in place.
18	How often do you implement vulnerability scans?	'We are ISO 27001 compliant and a regularly audited internally and externally We schedule annual penetration (vulnerability scans) test

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