

For internal use only

Healthcare Gateway Services Privacy Statement

Scope.

This Statement sets out the basis for any personal data of those customers whose data are, processed by Healthcare Gateway Ltd or within the Healthcare Gateway Ltd environment or any other environment as agreed with the Customer.

Any references to 'we', 'us' or 'our' in this Statement refer to Healthcare Gateway Ltd and its subsidiaries.

Any references to 'you' or 'your' refers to the ender user whose data Healthcare Gateway Ltd processes on behalf of the Customer.

Definitions

Statement

Statement means Services Privacy Statement. In this Statement, we explain how we collect, store, use, maintain and retain Customer Data.

Customer Data

Customer Data means Personal Data, which our Customers and/or their end-users input or upload into the customer portals or services, provided to them by Healthcare Gateway Ltd. This does not include Customer Information collected directly by Healthcare Gateway Ltd for business activities such as sales and marketing.

Healthcare Gateway Ltd is the Data Processor in relation to Customer Data.

Services Data

Service Data means the data that resides on Healthcare Gateway Ltd, customers or third party systems to which Healthcare Gateway Ltd is provided access to perform services, including cloud environments, test environment, development and production environments, in order to perform any of the services and business related functions including but not limited to:

- Professional services
- Support services
- Consultancy and Training
- Hosting
- Technical services
- Managed services
- IT and Administrative operations
- Product/Software updates and promotions

Services Data may include Customer Data. Healthcare Gateway Ltd is the Data Processor in relation to Services Data and treats it in accordance with the terms of the contractual agreements with the Customer.

Personal Data

Personal data is defined in the UK General Data Protection Regulation as;

“‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

Where Healthcare Gateway Ltd process Customer Data or Services Data that includes Personal Data, this will be referred to as Customer Personal Data

Customer Information

Customer Information means Personal Data we collect from visitors to our websites, data we collect about our customers or prospective customers, vendors, service providers, professional advisors, consultants and other third parties in the course of doing business

Healthcare Gateway Ltd is the Data Controller in relation to Customer Information. Please refer to our separate Privacy Policy.

Data Controller

The UK General Data Protection Regulation defines a Data Controller as:

- the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Processor

The UK General Data Protection Regulation defines a Data Processor as:

- ‘processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Healthcare Gateway Ltd act as a Data Processor, we will process all Personal Data strictly on behalf of our Customers in accordance with our contractual agreements with them and/or as required or permitted by law.

How do we use Customer Personal Data?

Customer Personal Data may be processed as a result of Customers use of the services when our Customers or their end-users input or upload information into the relevant service (platform/portal/environment).

For example, we will share information only to provide health and care professionals directly involved in your care access to the most up-to-date information about you. Access to information is strictly controlled, based on the role of the professional, and where the user has a direct care relationship with you.

How do we process Customer Personal Data

Healthcare Gateway Ltd processes (collection/storage) Customer Personal Data for the following purposes:

- To provide and deliver services
- To prevent or to address any service or technical problems
- To provide customer service or support
- In accordance with or as may be required by law
- For any other purpose provided for in the agreement between us and the customer, or as otherwise agreed by the customer

The lawful basis for processing Customer Personal Data is it is necessary to support the legitimate interests of our Customers.

Healthcare Gateway Ltd will retain Customer Personal Data in accordance with the requirements of contractual agreement with the Customer. Healthcare Gateway Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes.

Healthcare Gateway Ltd will not keep Customer Personal Data longer than required for any of the purposes specified above.

Security

We deploy and maintain appropriate security measures across all our services in order to protect Customer Personal Data from unauthorised disclosure, loss or destruction. However, we expect our Customers and their end users to access the services within a secure environment and notify us of any misuse or loss of integrity.

Transfers of personal data overseas

We are a UK based business, we do not transfer your personal data outside the European Economic Area (EEA).

Data Subject Rights

As an end user, if you have any questions or concerns about the processing of Customer Personal Data, please contact our Customer (Data Controller) directly.

Similarly please direct any of the following requests, in relation to Customer Personal Data, to the Customer:

- Data Subject Access Request
- Requests to rectify/amend/delete your data
- Requests to restrict processing of your data
- Objections to the processing of your data

Following your request, if the Customer contacts us in order to retrieve, amend or delete your data, we will do so in accordance with our contractual agreement with them and the applicable data protection legislation.

Contact

If you have any comments or concerns regarding the above, or the manner in which We handle your personal data or if you would like to exercise any of the rights outlined above then please do feel free to contact us at:

enquiries@healthcaregateway.co.uk