

CUSTOMER PRIVACY NOTICE

Dr Foster collects personal information about you when you use our tools or services or when you enquire about what we can do for you. We use this information for contracts administration, to deliver services to you, to keep you updated about Dr Foster products and services, to monitor usage of tools for security and to inform development. This notice explains more about what we collect and how we use your personal information.

What information we collect about you

We collect information about you when you contact us to enquire about our products and services and during the course of any contract you may take with us. This will include contact details and correspondence such as emails, letters, notes of telephone conversations and queries made via our support team.

We collect prospective customer data from a number of sources, through recommendations, public directories, networking events and from <u>Oscar Research</u>, a compiler of public sector contact information.

Anonymised cookies data is collected via <u>DrFoster.com</u>. We use cookies on our website to analyse traffic and improve the way it works. The cookies are anonymised and not used to identify individuals. You can control cookies settings in your browser. For more information on which cookies we use please see our <u>Cookies notice</u>. We cannot identify you from cookies data collected via <u>DrFoster.com</u>.

Identifiable cookies data is collected when you use our online tools.

Your status as an administrator or authorised user on My Dr Foster will be recorded as will any documentation we require to verify your authorisation to access the service.

How we use your information

We collect and use information about you to:

- Enter into and fulfil contracts with you
- Provide our products and services to you
- Develop and improve our products and services
- Monitor usage and create audit logs to maintain the security of the data we process
- Comply with our obligations under our agreements with NHS Digital, as well as the requirements
 of the NHS Data Security and Protection Toolkit and our ISO 27001 certification, such as
 ensuring that only authorised users have access to the data we process
- Provide you with information about the products and services we offer

The legal reasons, under the General Data Protection Regulation (GDPR), for processing your information are that it is:

- Necessary for a contract or to enter into a contract
- Necessary for purposes of our legitimate interests and those of our customers

Our legitimate interests include providing you with notice of system changes and keeping you up to date with our products and services. This may include emails to let you know about changes to the products you are using or other system notices. It may also include marketing of our products and services to you. You can opt out of these messages at any time by clicking on the link provided or by contacting us with your communication preferences.



Our legitimate interests also include ensuring the security of our information systems and the data we process.

Information we may share with other organisations

In exceptional circumstances we may be asked to share your information with police or other investigators if it would prevent or detect crime or safeguard a person's wellbeing. Each instance will be judged on its own merit and any sharing of information will be done within the law.

Information processed abroad

My Dr Foster data is processed in the UK.

Correspondence through Outlook is processed through <u>Microsoft Office 365</u>. This is processed on servers in Australia. We use <u>Mailchimp</u> to manage mailing lists. Mailchimp is based in the USA and is certified to the EU-U.S. Privacy Shield Framework.

How long we keep your information

We keep your data as long as it is necessary for the purpose it was collected. Correspondence and usage data is retained as necessary throughout the contract to support our customers. Information relating to contracts and finance is generally kept for six years after the contract's end in line with standard practice and legislation including the Limitation Act 1980.

Accessing your information and other rights

You have a number of rights relating to your personal information. These include:

Access	You have the right to request a copy of any personal information we hold about you.	
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If you would like a copy of any of your information please contact Information Governance on the details below. Your request will be processed within a month.

Portability If you have provided information on the basis of your consent or for a contract then

you can request a digital copy so you can send it to another organisation.

To request a copy please contact Information Governance on the details below. Your

request will be processed within a month.

Correction If any of the information we hold about you is incorrect or incomplete then please let

us know. You have the right to have your information corrected so that we hold

accurate records about you.

Erasure This is also known as the right to be forgotten. You can request that your personal

information is erased if it is no longer necessary for Dr Foster to keep it, or you withdraw consent that you have previously provided, or you object and there are no

overriding grounds to keep it or if it is unlawful to continue to keep it.

Restriction You can request that the use of your personal information is limited to storage only

and that we use it for no other purpose. This applies where you contest the accuracy of the personal information we hold, or our use of the information is unlawful, or we no longer need the information except in relation to legal claims, or you object to the use of your data and we need to verify whether or not our purpose for keeping it overrides

the grounds of your objection.

How to object or withdraw consent

If you object to our use of your personal information then we must stop unless we can demonstrate compelling legitimate grounds for continuing. You can opt out of marketing emails using the link provided



in the message. You can also opt out or object to processing of your information by sending an email to DFinfo@health.telstra.com. You can also manage your communication preferences in My Dr Foster.

If you have provided your consent for the use of your personal information then you can withdraw this consent at any time using the contact details below.

How to contact us

For general enquiries please call +44 (0)20 7332 8800 or write to Dr Foster, 3 Dorset Rise, London, EC4Y 8FN

If you have a query about your personal information rights then please contact our Data Protection Officer by email on DrFoster-InfoGovInbox@health.telstra.com or by post at: Information Governance, Dr Foster, BioCity Nottingham, Pennyfoot Street, Nottingham, NG1 1GF.

How to complain

If you feel that we have let you down in relation to your information rights then please contact Dr Foster Information Governance using the details above.

You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is ico.org.uk and their telephone helpline number is 0303 123 1113.