

DocAbode Policy on the Use and Sharing of Personal Information

Version 0.1

Revision History

Version	Author	Date	Comment
0.1	JP	21/3/18	Initial draft
0.2	JP	29/3/18	Add patient and HCP requirements
1.0	JP	01/3/19	Annual Review, add contact email address

1 Introduction

The use and sharing of personal information is covered by the Data Protection Act 1998. The use and sharing of the personal information of the clients of some customers, such as NHS organisations, is subject to further obligations. This policy sets out how DocAbode complies with its legal and contractual obligations.

2 Scope

This policy applies to all DocAbode employees, (including contractors and business partners), patients and Health Care professionals (HCP)

3 Personal Information relating to employees

Personal and Sensitive Personal information relating to employees contained in Human Resources records and payroll information is accessible only to a restricted number of individuals and business partners (for example, the payroll company and bank) on a strictly need-to-know basis.

With the consent of individuals, certain Personal information, such as their personal mobile phone number, is made available to other employees. Such information must not be shared with anyone outside of DocAbode without the explicit consent of the individual.

With the consent of individuals, a brief professional biography is published on the company website, and may appear in other publications by the company, such as commercial bids for work. All such publications must only be made with the explicit consent of the individual.

4 Personal Information relating to end-users

As part of DocAbode's services, we process Personal and Sensitive Personal information relating to the clients of our customers, ("end-users") such as patients and HCPs. All such processing takes place on our secure cloud platforms. DocAbode staff will not have access to this information. However in the event that such access is gained, such as in the event of a security breach by our cloud suppliers, Personal and Sensitive Personal information relating to end-users must not be used, stored or transferred outside of the system cloud systems.

No end-user information must be conveyed by email (other than via NHSmail, and then only to another NHSmail user), or placed on any removable media or other insecure environment without being securely encrypted, and only then with the express consent of the appropriate Information Asset Owner.

5 Personal Information relating to business contacts

Personal information (such as name, role, company, company telephone number and company email address) of business contacts, including business partners, customers, and sales prospects will be used in accordance with good business practice. Such information collected by DocAbode will never be sold or traded by DocAbode.

6 Subject Access Requests

The Data Protection Act gives individuals the right to see personal data held on themselves, to claim damages for losses arising from unauthorised use of personal data and to have inaccurate data rectified. Individuals requesting access to their Personal information held by DocAbode, requesting

that such information is corrected, or objecting to processing of their data by DocAbode, must follow the process described in the Privacy Notice of the DocAbode service, or by contacting DocAbode by post or email to info@docabode.com.

7 Privacy of Electronic Communications Regulations

DocAbode's use of Personal information, both that of our end-users, and that of business contacts, will comply with the Privacy of Electronic Communications (EC Directive) Regulations 2003 (as amended).

7.1 Marketing communications

We only send electronic marketing to:

- contacts and end-users who have given us explicit consent to do so; and
- previous customers, about our own similar products, who have not opted-out of such communications.

All our marketing electronic communications include opt-outs to further communications.

7.2 Cookies and similar technologies

We inform users of our websites and online services if we set cookies or use similar technologies to store information on a user's device, and clearly explain what the cookies/technology do and why. We also obtain the user's consent. Consent might be implied, but must be knowingly given.

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