

Privacy notice : EMMS Healthcare Ltd (EyeV – E-ers platform)

available at www.eyev.health

Our contact details:

Name: EMMS Healthcare Limited

Address: 186 Wollaton Road, Wollaton, Nottingham, NG8 1HJ

E-mail: adam@emmshealthcare.co.uk

To delivery an Eye Care Electronic Referral System (EyeV), we are required to process personal data about users of EyeV and patients. “Processing” can mean collecting, recording, organising, storing, sharing or destroying data.

We are committed to being transparent about why we need your personal data and what we do with it. This information is set out in this privacy notice. It also explains your rights when it comes to your data.

If you have any concerns or questions please contact us

adam@emmshealthcare.co.uk

i) Information for EyeV platform users: (optometrist, clinician, healthcare practitioners and healthcare admin teams)

What data do we process?

We receive your personal information directly, when you sign up to use the platform.

This includes the following:

- Personal identifiers, contacts and characteristics (for example, name and contact details, email address, phone number)
- IP address
- User access credentials such as a user ID and username
- Address

- Date of birth
- Regulatory body identifying numbers
- Details pertaining to your employer

We may also receive your personal information indirectly, from the following sources:

- Your employer or National Health Service organisation
- A regulatory body

Why we process this information?

- To create a user account for the EyeV platform. Once you have an account you can use EyeV to refer, request advice and guidance and triage patients as dictated by your role
- Where relevant professionally, we need your personal ID and your GOC number for validation against the GOC register
- To ensure an accurate and safe clinical record each episode requires stamping with the name and contact details of the person who undertook the action.
- For correspondence relating to any referrals, advice requests and triage to EyeV for which you have a legitimate interest
- To send to you information about updates or changes to the EyeV platform which you will need to know in order to continue to use the platform in a safe and effective way for example; upgrades and changes to EyeV functionality, changes to referral criteria for certain providers, changes in contact details for providers.
- To audit medical referrals and identity involved clinicians

Regulations for sharing your information:

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Your consent. By onboarding to EyeV you are consenting to sharing your details with us for the purposes detailed above in the section 'Why we need your information'. You are able to remove your consent at any time.
- We have a contractual obligation with NHS commissioner to provide an Eye Care Electronic Referral System.
- We have a legal obligation to fulfil the agreed contract with the NHS Commissioner.
- We have a vital interest.
- We have a legitimate interest for example; ensuring that any activity you undertake on the EyeV system is traceable to you and contains the relevant information about you as is required legally and professionally for any clinical medical record, to ensure you are eligible to have an EyeV account and to communicate updates about the EyeV system to you.

We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent. You can do this by contacting adam@emmshealthcare.co.uk.

Who we may share this information with:

We may share this information with NHS organisations and any regulatory body where there is a legal duty to do so, in accordance with the UK General Data Protection Regulation.

As part of the onboarding process we require super users in Optometry practices to undertake an enhanced identification verification process which involves you directly sharing an image of your driving license with STRIPE. Their privacy notice is available here. If you do not wish to use the STRIPE process you can contact the EMMS healthcare limited helpdesk who will verify your identity via a video call. We

do not keep a copy of any of your images but we do record the verification was successful.

How we store your personal information:

Your information is securely stored. We keep all information stated in this privacy notice for as long as you have an account with us or for the duration of our contract with the commissioner to provide an Electronic Eyecare Referral Service (whichever is sooner), or as long as is legally required if storage is for medicolegal reasons. We will then dispose of your information by physically permanently deleting your information from our computer systems.

ii) Information for patients - individuals who's data is processed by the EyeV platform:

What data do we process?

We process your personal information directly from your optician and NHS organisations

The type of information which is processed and stored:

- Personal identifiers, contacts and characteristics (for example, name and contact details)
- Address
- Date of birth
- Healthcare records entered into an ophthalmic referral form or triage service

Why we process your data?

We process your data to:

- allow your healthcare professional to refer you to an NHS eye care service or to ask another healthcare professional for advice about your care
- ensure that decisions about your care are made in your best interests

- allow you to be contacted by the NHS about your care
- audit medical referrals and identity involved clinicians.

Regulations for sharing your information:

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- We have a contractual obligation with NHS commissioner to provide an Eye Care Electronic Referral System.
 - We have a legal obligation to fulfil the agreed contract with the NHS Commissioner.
 - We have a vital interest
 - We have a legitimate interest for example; to ensure accurate and complete information about you is shared with the appropriate healthcare professionals to allow them to make decisions about your care which are in your best interests, to allow the NHS to contact you about your care.

Who we may share this information with:

We may share this information with any National Health Service eg NHS trusts, optometrists, independent providers of NHS eye care services, and your GP, where there is a legitimate reason to do so.

How we store your personal information

Your information is securely stored. We keep all information stated in this privacy notice for the duration of the contract with the NHS commissioner and in accordance with [NHS guidance](#), or as long as is legally required if storage is for medicolegal reasons. We will then dispose of your information by physically permanently deleting your information from our computer systems.

iii) Information for all data subjects - Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at adam@emmshealthcare.co.uk if you wish to make a request. Your query may be referred to your local optometrist if appropriate.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at adam@emmshealthcare.co.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>