

South Manchester GP Federation Ltd

Barlow Medical Centre

## General Privacy Notice for Suppliers

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# General Privacy Notice for Suppliers

This Privacy Notice is intended for our suppliers and service providers and any representatives or contact persons of our suppliers and service providers.

For the purpose of this Privacy Notice, the data controller is Barlow Medical Centre.

We invite you to carefully read this Privacy Notice, which sets out in which context we are processing your personal data and explains your rights and our obligations when doing so.

Should you have any further question in relation to the processing of your personal data please contact us at Barlow Medical Centre.

## **What information do we have about you?**

This information may either be directly provided by you or provided by our supplier or service provider (i.e. the legal entity for whom you work).

We may collect various types of personal data about you, including:

- your general and identification information (e.g. name, first name, last name, gender, date and place of birth, nationality, ID card or passport numbers, email and/or postal address, fixed and/or mobile phone number and car registration number);
- your role (e.g. title, position and name of company);
- for people acting as suppliers or service providers, your financial information (e.g. bank account details); and
- your electronic identification data where required for the purpose of the delivery of products or services to ourselves (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times, image recording or sound such as badge pictures, CCTV).

- If you intend to provide us with personal data about other individuals (e.g. your colleagues) you must provide a copy of this Privacy Notice to the relevant individuals, directly or through your employer.

## **How we use your personal data and why is this justified?**

We only collect and process your personal data, which is adequate, relevant and not excessive, as required to meet our legitimate purposes. We strive to ensure that your personal data remains up to date and accurate.

### **Legal basis for the processing**

We will only process your personal data if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations; or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

Please note that, when processing your personal data on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy.

Examples of such 'legitimate interests' are data processing activities performed:

- to benefit from cost-effective services (e.g. we may opt to use certain services offered by suppliers to process data);
- to offer our products and/or services to our customers;

- to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks; and,

to meet our corporate or social responsibility objectives.

## **Purposes of the processing**

We process your personal data for the following purposes:

- to manage our suppliers and service providers throughout any supply chain;
- implement administrative or other lawful business tasks in preparation of or to perform existing contracts;
- monitor activities at our premises and/or practices/facilities, including compliance with applicable policies including any health and safety rules in place;
- grant you access to our premises or systems to allow you to provide us with certain services;
- manage our IT resources, including infrastructure management and business continuity;
- preserve the practice or company's economic interests and ensure compliance and reporting (such as complying with our regulatory requirements and policies and our legal requirements e.g. HMRC, managing any alleged cases of negligence, misconduct or fraud, conducting audits and defending any legal cases);
- manage mergers and acquisitions involving our practice or company;
- archiving and record-keeping;
- billing and invoicing; and
- any other purposes imposed by legal requirements.

## **Who has access to your personal data**

We will not share your personal data to third parties other than those indicated in this Privacy Notice.

In the course of our legitimate business activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by or transferred to the following categories of recipients where appropriate for our legitimate interests:

- our personnel (including medical professionals, admin staff or other areas of our practice);
- our other suppliers and services providers that provide services and products to us where necessary;
- our IT systems providers, cloud service providers, database providers and consultants;
- any third party to whom we assign any of our rights or obligations; and
- our professional and legal advisors.

We ensure that only a limited number of authorised staff or other roles as mentioned above have access to your personal information (where it is appropriate to their role) and access is only allowed on a strict 'need-to-know' basis.

The above third parties are contractually obliged by us to protect the confidentiality and security of your personal data.

Your personal data can also be accessed by or transferred to any regulatory, enforcement, public agency or court, where we are required to do so by applicable legislation or regulation.

## **How do we protect your personal data?**

We have appropriate technical and organisational measures in place to provide a level of security and confidentiality to your personal data.

We protect against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access and against other unlawful forms of processing.

## **How long do we store your personal data?**

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

The retention period is the term of your, or your company's, supply or service contract with us, plus any period until the legal claims under the relevant contract become time-barred, unless overriding legal or regulatory schedules require a longer or shorter retention period. When this period expires, your personal data is deleted from our active systems.

Personal data collected and processed in the context of any dispute are deleted or archived (i) as soon as an amicable settlement has been reached, (ii) once a decision in last resort has been rendered or (iii) when the claim becomes time barred.

## **Your Privacy Rights**

You have rights relating to your personal information. You can find more information about your privacy rights on the Information Commissioner's Office website [www.ico.org.uk](http://www.ico.org.uk). You have the right to be informed about how and why we process your personal information and any time you give us personal information you have the right to be informed about why we need it and how we'll use it.

You can find most of the information you need in this Privacy Notice.

If you have any questions please contact us through the above contact details.

## **You have the right to access your personal information**

You can request a copy of information we hold about you at any time.

You may choose to exercise your right of access through any of our contact details, but we'll ask you to provide documented evidence of your identity before we process your request. We may also contact you to clarify your request or to ensure we have all the information we need to fully meet your request.

We aim to respond to your request within 30 calendar days of verifying your identity (or within 3 months for more complex cases). You'll receive a full response as soon as we can reasonably provide one. In more complex cases where we cannot provide a full substantive response within that time frame, we'll write to you within 30 calendar days to explain why an extension is needed.

We don't charge for subject access requests.

## **You have the right to ask us to correct inaccurate personal information we hold about you**

If you believe information we hold about you to be inaccurate or incomplete, you can ask us to correct it or complete it at any time, through any of our contact channels. Wherever possible, we'll correct inaccurate or incomplete information immediately. Whilst we investigate the accuracy of the information, we'll restrict the processing of the information in question.

## **You have the right to ask us to delete your personal information**

In some circumstances you have the right to ask us to delete information we hold about you. We can't delete any information where we have a legal or regulatory obligation to keep it. For example, this applies to all outstanding debts and some HMRC information that we are required to keep by law. We may also refuse your request if we believe it to be excessive. If your request for deletion is refused, we'll explain the reasons for refusal.

You can object to us using your data at any time through any of our contact details above.

## **Storing or transferring your information outside the European Economic Area ("EEA")**

We do not transfer or store your personal information outside the EEA.

## **Complaints or queries**

Barlow Medical Centre tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive details of all aspects of Barlow Medical Centre's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the contact details above.

If you believe that Barlow Medical Centre has not complied with your data protection rights, you can complain to:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF.

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.



Fax: 01625 524 510

## **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated in May 2018.