AT TECH PRIVACY POLICY

This privacy policy applies to individuals who engage with our operations in the United Kingdom. AT Tech is part of the Operose Health Group. For the Operose Health Group privacy policy please see <https://www.operosehealth.co.uk/privacy-policy>.

AT Tech respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our and tell you about your privacy rights and how the law protects you.

This privacy policy will inform you on how AT Tech collects and processes your personal data.

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1. About us

AT Tech is part of the Operose Health Group and is the developer of technology and applications used to support primary healthcare services.

AT Tech is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details in the "Contact us" section.

Where you provide personal data to us about other people (for example, staff members), you should share a copy of this privacy policy with them before providing us with their personal data.

1. What is this Privacy Notice about?

A privacy notice is a statement that describes how an organisation collects, uses, retains and discloses personal data, or special categories of personal data. Different organisations sometimes use different terms, and it can be referred to as a privacy statement, a fair processing notice or a privacy policy.

Being transparent and providing accessible information to individuals about how an organisation will use their personal information is a key element of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. To ensure that we process your personal data fairly, lawfully and transparently we are required by law to provide you with the following information:

* What information we collect and process about you
* How we process your personal data
* The purpose of processing
* Recipients or categories recipients of your personal data
* The identity of our Data Protection Officer
* How long we retain personal information about you
* The lawful bases for processing
* Your rights - to view, request access copies of your personal information, or object to the processing of your personal information.

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

* Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
* Contact Data includes billing address, delivery address, email address and telephone numbers.
* Technical Data includes IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
* Marketing and Communications Dataincludes your preferences in receiving marketing from us and your communication preferences.
* Business information including service level agreements to enable us to enter in to a contract with you
* Financial data including billing information and bank details
* Anonymised Statistical data from our applications

1. How is your personal data collected?

We use different methods to collect data from and about you including through:

* **Direct interactions.** You may give us your data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:
* Entering a contract with us;
* register to use our site;
* request marketing to be sent to you;
* enter a competition, promotion or survey; or
* give us feedback or contact us.
* **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
* **Third parties or publicly available sources.** We are working closely with third parties (including, for example, business partners, suppliers and sub-contractors) including your registered GP provider. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

1. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

* to provide services and products you subscribe from us, with the information these services will be delivered that you request from us;
* to provide you with information about other services we offer that are similar to those that you have already requested or enquired about, or redirect you to alternative options;
* to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you;
* to notify you about changes to our service;
* to ensure that content from our site is presented in the most effective manner for you and for your computer;
* where we need to perform the contract we are about to enter into or have entered into with you;
* where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
* where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To register you as a new customer | (a) Identity  (b) Contact | Performance of a contract with you |
| To process and deliver your services including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us | (a) Identity  (b) Contact  (c) Financial  (d) Transaction  (e) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey | (a) Identity  (b) Contact  (c) Profile  (d) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To enable you to partake in a prize draw, competition or complete a survey | (a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity  (b) Contact  (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications  (f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical  (b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity  (b) Contact  (c) Technical  (d) Usage  (e) Profile  (f) Marketing and Communications | Necessary for our legitimate interests (to develop our products/services and grow our business) or whereby you have consented to receive information about our products |

Marketing

We will only send if you have consented to receive information. You have the right to ask us not to process your personal data for marketing purposes.

You can opt out of marketing emails at any time by unsubscribing using the link in the email.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

1. Automated Processing

No automated processing is undertaken.

1. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

If we choose to sell, transfer or merge parts of our business or our assets to other businesses, then the new owners may use your personal data in the same way as set out in this privacy policy. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

1. International transfers

Your data is not transferred outside the UK or EEA.

1. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

1. Your legal rights

Where information from which you can be identified is held, you have the:

* + Right of access to view or request copies of the record
  + Right to rectification of inaccurate personal data or special categories of personal data
  + Right to restriction of the processing of your data where accuracy of the data is contested, processing is unlawful or where we no longer need the data for the purposes of the processing
  + Right not to be subject to any automated individual decision-making
  + Right to data portability by requesting the data which you provided to us (not data generated by us) in a structured, commonly used machine-readable format. Your right to portability shall apply only where:
* data is processed by automated means, and
* you provided consent to the processing or,
* the processing is necessary for the fulfilment of a contract.

Right to object

In line with the Data Protection Legislation, you do not have the right to object to the processing of your personal information where:

* + The purpose of the processing is for direct provision of care or safeguarding concerns. As a primary care and community health provider, we have legitimate compelling grounds under the Health and Social Care Act 2012 to process your personal information for the purposes of direct care delivery, and to prevent an individual from harm, or to prevent a serious crime. This include personal information concerning your health which we share with other GP Practices, NHS acute or mental health Trusts, social services, community health providers and pharmacists who are also involved in your care.
  + The processing is necessary for compliance with a legal obligation to which we are subject. This includes information we share with statutory organisations, law enforcement and regulatory bodies such as NHS Digital (statutory data collection), NHS Counter Fraud, the Police, Courts of Justice, HMRC and DVLA.

You do not have the right to object to the processing of your personal information for risk stratification for indirect care purpose such as understanding the local population needs and plan for future requirement in line with Section 251 NHS Act 2006.

Right to erasure (right to be forgotten)

Your right to erasure (right to be forgotten) applies where you had given ‘consent’ to process your personal data and later withdrew the consent. Right to erasure does not apply to the extent where the processing of your personal health data is necessary for:

* + Compliance with a legal obligation which we are subject to, under the UK law or, for the performance of a task carried out in the public interest or, in the exercise of official authority vested on us;
  + medical purposes and/or for reasons of public interest in the area of public health;
  + archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
  + the establishment, exercise or defence of legal claims.

1. Contact us

If you have any questions about this privacy policy or our privacy practices, please contact our DPO below:

Full name of legal entity: AT Technology Services Limited

DPO name: Kathleen Bailey

Email address: dpo@operosehealth.co.uk

If you are dissatisfied with the way we process your data, please contact us and we will try to resolve your complaint. You also have the right to appeal/complain to the Information Commissioner (ICO). The ICO can be contacted at:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

Tel: 0303 123 1113 or 01625 545 745

Email: <https://ico.org.uk/global/contact-us/>

1. Updates to this Privacy Policy

We will keep this policy under review and will update it from time to time to reflect developments in data protection law, regulation or new technologies. Any changes we make to this policy will be published in an updated version on this website and we will bring any key changes to your attention.

This Privacy Policy was last updated on: 24/06/2024.