



Privacy Notice

We understand how important it is to keep your personal information safe and secure and we take this very seriously. We have taken steps to make sure your personal information is looked after in the best possible way, and we review this regularly.

We strictly adhere to the rules laid out by data-protection laws and the General Data Protection Regulation (GDPR).

This privacy notice aims to give you information on how we collect and process your personal data through your use of our site, software, and to our business in general, including any data you may provide if you contact us for job opportunities or enquiries.

Ozone Health Ltd is the overarching board and governance for Ozone Health Ltd (OH), Clinical Partnership (CP) & The World Healthnet Ltd (WHN). All our companies are registered at:

Pod 2, The Treetops, Hesslewood Business Park, Ferriby Road, Hessle, HU13 0LH
t: [01482 908208](tel:01482908208) e: governance@ozonehealth.co.uk

and their full names and registered company numbers are as follows:

- Clinical Collective Ltd t/a Clinical Partnership - 10288489
- The World Healthnet Ltd - 12388159
- Ozone Health Ltd - 13998045

Each of these companies may, to the extent relevant, collect, retain and use information about you.

We have appointed a Data Protection Officer (DPO) who is responsible for monitoring and providing guidance with our GDPR status. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the contact information laid out below in this privacy notice titling any emails in the subject as DPO.

Personal Data We Collect

We will collect the following types of information from you as a patient or service user, or about you from a third party (GP, Consultant Specialist, provider organisation(s) or other Healthcare professional) engaged in the delivery of your care.

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We may collect, use, store and transfer different kinds of personal data about you. We collate them into groups:

- Your identity and health, which includes information such as:
 - Details about you such as name, address, contact details, carer details.
 - Any contact you have had with one of our services such as appointments and emails.
 - Your country of birth, nationality.
 - Date of birth and gender.
- Your contact information, which includes information such as billing address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.
- Special category information such as:
 - Notes and reports about your health.
 - Details about your treatment and care.
 - Results of investigations such as ultrasound studies and laboratory tests, eye tests, etc.
 - Relevant information from other health professionals.
- Technical data, which includes your internet protocol (IP) address, 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 our platform.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality.
- Implementing policies and procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data), including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

Some information may be used for reporting purposes. Where we use this information, strict measures are in place to ensure that individual patients cannot be identified.

Special personal information is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We may collect special personal information about you only if there is a lawful basis on which to do so.

We will only store your personal data in the UK. This means that it will be fully protected under the UK Data Protection Legislation.

A copy of our Information Governance pack containing these policies and procedures may be requested from our Data Protection Officer.

Our Lawful Basis

In our use of health and care information, we satisfy the common law duty of confidentiality because:

- You have provided us with your consent (either implicitly to provide you with care, or explicitly for other uses).
- The public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime).

We only collect and use personal information about you when the law allows us to. By the law, we are mainly referring to:

- General Data Protection Regulation 2018
- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998

Most commonly, we use your data on the following lawful basis:

1. The data subject (*you*) have given consent to the processing
2. Processing is necessary for the performance of a contract
3. Processing is necessary for compliance with a legal obligation to which the controller is subject
4. Processing is necessary in order to protect the vital interests of the data subject
5. Processing is necessary for the purpose of the legitimate interests pursued by the controller or third party

Children's Information

We understand that child data, much like health data is classed as highly sensitive and high-risk information and as a result, we have ensured that extra security layers are in place to protect this type of data when we process it. Data Protection Impact Assessment analysis has taken place to achieve this, which also involves reviewing these periodically to ensure the security is constantly evolving to keep up with the latest threats and security innovations.

Children accessing our services can follow the link to the Children's Policy [here](#).

Family & Friends

As part of our work providing high-quality care and support, it might be necessary that we hold the following information on your next of kin:

- Basic details and contact information, e.g. name, address and phone number

By law, we need to have a lawful basis for processing your personal data.

We process your data because we have a legitimate business interest in holding next of kin and lasting power of attorney information about the individuals who use our service and keeping emergency contact details for our staff.

Our Security

We are committed to handling your personal information with high standards of information security. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, authorisation, electronic and managerial procedures to safeguard and secure the information we collect.

Our platforms use Secure Sockets Layer (SSL) certificates to verify users' identity for access and to encrypt any data you give us. Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

As part of our mandatory annual training all employees have enough information security training for their role, and we have developed a robust suite of Information Security policies and procedures to ensure each aspect of the handling of personal data is done with security as our focus.

How Long Do We Keep Your Data For?

We ensure that your personal data is retained for the period that our services need it for and in line with applicable laws and the NHSX Record Management Code of Practice. All personal information we collect has a defined retention period as outlined in the code of practice, which is in line with our Record Management & Lifecycle policy. If you would like to find out how long your information is being retained, please contact our Data Protection Officer. When no longer required, data is destroyed securely and safely without undue delay by an NHS authorised provider.

National Opt-Out

We review our data processing on a monthly basis to assess if the national data opt-out applies. This is recorded in our Record of Processing Activities. All new processing is assessed to see if the national data opt-out applies.

If any data processing falls within scope of the National Data Opt-Out we use [MESH](#) to check if any of our service users have opted out of their data being used for this purpose.

At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. We review all of the confidential patient information we process on an annual basis to see if this is used for research and planning purposes. If it is, then individuals can decide to stop their information being shared for

this purpose. You can find out more information at [matters](#).

[nhs.uk/your-nhs-data-](https://nhs.uk/your-nhs-data-matters)

You can change your mind about your choice at any time.

Providing Your Information to Others

We will not disclose your information to any third party without your permission, unless there are exceptional circumstances (i.e. life or death situations), or where the law requires such information to be shared. This means we may be required to share your information with the following organisations:

- NHS Trusts and Foundation Trusts
- Referring GPs
- NHS Clinical Commissioning Groups/Integrated Care Boards
- Police and Judicial Services
- Friends and Family – with your permission

Our Sending & Transferring Information Securely Policy is available on request.

Sometimes we must process your information in order to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation, such as a search warrant or court order. This may include your personal information.

Your Individual Rights

In this section, we have summarised the rights that you have under General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights. Please note, not all these rights are absolute, and we can refuse to comply with rights in certain scenarios. If this is ever the case, you will be notified with all the relevant information.

Your principal rights under General Data Protection Regulation are:

1. You have the right to request a copy of all of the data we keep about you. Generally, we will not charge for this service.
2. You have the right to ask us to correct any data we have which you believe to be inaccurate or incomplete. You can also request that we restrict all processing of your data while we consider your rectification request.
3. You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for. We retain our data in line with the NHSX Record Management Code of Practice.
4. You may also request that we restrict processing if we no longer require your personal data for the purpose we originally collected it for, but you do not wish for it to be erased.

5. You can ask for your data to be erased if we have asked for your consent to process your data. You can withdraw consent at any time – please contact us to do so.
6. If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection.

Under the General Data Protection Regulation, you have the right to confirmation as to whether we process your personal data and, where we do, you may request access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply you a copy of your personal data. The first copy will be provided free of charge, but duplicate copies or requests deemed excessive may be subject to a reasonable fee.

You as a data subject have the right to rectification, which will allow you as the data subject to modify/change any personal information for the purpose of ensuring that the information we process is up to date.

The right to erasure or the right to be forgotten will allow you as the data subject to inform us that you no longer want us to store or process your personal information. Please be aware that we may decline your right for several reasons, which are not limited to, having a lawful basis to process your information or us needing your information for the performance of a contractual obligation.

As a data subject, you have the right to stop any processing of your personal information. Please be aware that you must provide us with a legitimate reason for us to stop processing. Any request made that does not conform to the GDPR will be rejected.

The right to data portability will allow you as the data subject to have your personal information securely transferred to another organisation for processing in a format that can be read by a computer.

Communicating With Us

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our service. We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is. We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

By Post: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By Website: ico.org.uk

By Phone: 0303 123 1113 (Local rate) or 01625 545 745 (National rate)

ICO registration information:

Ozone Health Ltd: ico.org.uk/ESDWebPages/Entry/ZB347885

Clinical Partnership: ico.org.uk/ESDWebPages/Entry/ZA179855

The World Healthnet Ltd: ico.org.uk/ESDWebPages/Entry/ZA612905

Our Data Protection Officer

To ensure data subjects have a voice within the business, we have appointed a Data Protection Officer (DPO) to work alongside our Information Assurance Director to ensure GDPR and Information Security compliance is continuously monitored and improved in accordance with the law. Our DPO is your main point of contact should you have any questions or issues with the way in which we process your personal data. To contact our DPO you can use one of the following options:

Email: governance@ozonehealth.co.uk, marking the email for the attention of the DPO

Post: Data Protection Officer, Pod 2, The Treetops, Hesslewood Business Park, Ferriby Road, Hessle, HU13 0LH

Information we collect through automated systems

Cookies

Our website does not use any cookies to track your behaviour or usage of the website. It uses Plausible analytics to track basic website usage.

Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website(s) are recorded. We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution and any hardware like webcams and device cameras.

We use this information in aggregate to assess the popularity of the pages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data could possibly be used to identify you personally, even if you are not signed into our website.

Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use. No such information is personally identifiable to you.

This Notice

We keep this Privacy Notice under regular review. This Policy was last updated on 04/04/2024.

Amendments

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.