

This Privacy Notice will explain how Afon Elai Partnership uses your personal data.

Afon Elai Partnership is the controller for personal information we process. The practice is committed to protection your personal information and respecting your privacy. We have a legal duty to explain how we use personal information about you as a registered patient at the practice.

What Information do we collect about you?

We will collect information about you and in relation to your health and health care services you have received. This will include personal information such as your NHS number, name, address, contact information, date of birth, and next of kin.

We will also collect sensitive personal information about you (also known as special category data) which includes information relating to your health (appointment visits, treatments information, test results, X-rays or reports), as well as information relating to your sexual orientation, race or religion.

All the above information we collect and hold about you forms part of your medical record and is primarily held to ensure you receive the best possible care and treatment.

We may also collect your personal image on surgery CCTV when you attend the practice premises.

How is your personal data collected?

The information we hold is collected through various routes; these may include:

- Direct interactions with you as our patient, when you register with us for care and treatment, during consultations with practice staff and when you subscribe to services for example, newsletters, text messaging, telephone recordings, creating an account for online services.
- Indirectly from other health care providers. When you attend other organisations providing health or social care services for example out of hours GP appointments or visits to A&E and some interactions with Social Care, they will let us know so that your GP record is kept up to date.
- Through wearable monitoring devices such as blood pressure monitors
- When your image is captured on practice CCTV Cameras
- Automated technologies such as when you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. This is collected using cookies, for further information about how we use cookies please see our cookie policy <https://www.afonelai.wales.nhs.uk/cookie-information/>

How do we use your information?



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The Information we collect about you is primarily used for your direct care and treatment but may also be used for:

- The management of healthcare services
- Participation in National Screening Programmes
- National Data Collection Requirements
- Medical research and clinical audit
- Legal requirements
- Security and Safety of our staff and premises

We will not share your information with any third parties for the purposes of direct marketing.

Partners we may share your information with

We may share your information, subject to agreement on how it will be used with the following organisations:

- NHS Trusts / Foundation Trusts/Health Boards
- Other GP's such as those GP Practices as part of a cluster
- Out of hours providers
- Diagnostic or treatment centres
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Ambulance Trusts
- Social Care Services
- Digital Health & Care Wales (DHCW) previously NHS Wales Informatics Services (NWIS)
- NHS Wales Shared Services
- Health and Care Research Wales
- Public Health Wales
- Healthcare Quality and Improvement Partnership
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- Voluntary Sector Providers
- Prehab2 Rehab programme, Cardiff & Vale UHB

In the event that you are referred to secondary care via the Urgent Suspected Cancer pathway, a member of the Prehab2Rehab team will contact you to book you into the Prehab2Rehab Service. This is optional and you will be given opportunity to consider this service during the call.

We may also use external third-party companies (data processors) to process your personal information. These companies will be bound by contractual agreements to ensure information is kept confidential and secure. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Our legal basis for processing your personal data

The Practice will only use and share your information where there is a legal basis to do so.

A full list of how your data may be used and shared can be found [here](#).

The legal bases for most of our processing relates to your direct care and treatment:

- Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Where we have a specific legal obligation that requires the processing of personal data, the legal basis is:

- Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject.

Where we process special category data, for example data concerning health, racial or ethnic origin, or sexual orientation, we need to meet an additional condition in the GDPR. Where we are processing special category personal data for purposes related to the commissioning and provision of health services the condition is:

- Article 9(2)(h) – processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and service; or
- Article 9(2)(i) – processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices.....

The Practice may process your personal data for the purposes of research in such circumstances our legal basis for doing so will be:

- Article 6 (1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.



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Where we process special category personal data for research purposes the legal basis for doing so is:

- Article 9 (2)(a) - you have provided your explicit consent
- Article 9(2)(j) – processing is necessary for...scientific or historical research purposes or statistical purposes.

The Practice may also process personal data for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings), for the purpose of obtaining legal advice, or for the purpose of establishing, exercising or defending legal rights. Where we process personal data for these purposes, the legal basis for doing so is:

- Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or
- Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject; or
- Article 6(1)(f) – processing is necessary for the purposes of legitimate interests pursued by the controller.

Where we process special category of personal data for these purposes, the legal basis for doing so is:

- Article 9(2)(f) – processing is necessary for the establishment, exercise or defence of legal claims; or
- Article 9(2)(g) – processing is necessary for reasons of substantial public interest.

In rare circumstances we may need to share information with law enforcement agencies or to protect the wellbeing of others for example to safeguard children or vulnerable adults. In such circumstances are legal basis for sharing information is:

- Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject; or
- Article 6(1)(d) - processing is necessary to protect the vital interest of the data subject or another natural person; or
- Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Where we share special categories of person data for the purposes of safeguarding, the legal basis for doing so is:

- Article 9(2)(g) - processing is necessary for reasons of substantial public interest; Data Protection Act 2018 S10 and Schedule 1, Paragraph 18 'Safeguarding of children and individuals at risk'

Retention of your Personal Information / Storing your Information



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We are required by UK law to keep your information and data for a defined period, often referred to as a retention period. The Practice will keep your information in line with the practice records management policy which can be found [here](#).

How to Contact us

Please contact the practice if you have any questions about our privacy notice or information, we hold about you

Lansdowne Surgery Contact – 02920395115

Westway Surgery Contact -

Contact Details of our Data Protection Officer

The Practice is required to appoint a data protection officer (DPO). This is an essential role in facilitating practice accountability and compliance with UK Data Protection Law.

Our Data Protection Officer is:

Digital Health and Care Wales (DHCW)
Information Governance, Data Protection Officer Support Service
4th Floor, Tŷ Glan-yr-Afon
21 Cowbridge Road East
Cardiff
CF11 9AD
Email : DHCWGMPDPO@wales.nhs.uk

Your Rights

The General Data Protection Regulation (GDPR) includes a number of rights. We must generally respond to requests in relation to your rights within one month, although there are some exceptions to this.

The availability of some of these rights depends on the legal basis that applies in relation to the processing of your personal data, and there are some other circumstances in which we may not uphold a request to exercise a right. Your rights and how they apply are described below.

Right to be Informed

Your right to be informed is met by the provision of this privacy notice, and similar information when we communicate with you directly – at the point of contact.

Right of Access

You have the right to obtain a copy of personal data that we hold about you and other information specified in the GDPR, although there are exceptions to what we are obliged to disclose.



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A situation in which we may not provide all the information is where in the opinion of an appropriate health professional disclosure would be likely to cause serious harm to your, or somebody else's physical or mental health.

Right to Rectification

You have the right to ask us to rectify any inaccurate data that we hold about you.

Right to Erasure ('right to be forgotten')

You have the right to request that we erase personal data about you that we hold. This is not an absolute right, and depending on the legal basis that applies, we may have overriding legitimate grounds to continue to process the data.

Right to Restriction of Processing

You have the right to request that we restrict processing of personal data about you that we hold. You can ask us to do this for example where you contest the accuracy of the data.

Right to Data Portability

This right is only available where the legal basis for processing under the GDPR is consent, or for the purposes of a contract between you and the Practice. For this to apply the data must be held in electronic form. The right is to be provided with the data in a commonly used electronic format.

Right to Object

You have the right to object to processing of personal data about you on grounds relating to your particular situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds, unless your object relates to marketing.

Rights in relation to automated individual decision-making including profiling

You have the right to object to being subject to a decision based solely on automated processing, including profiling. Should we perform any automated decision-making, we will record this in our privacy notice, and ensure that you have an opportunity to request that the decision involves personal consideration.

Right to complain to the Information Commissioner

You have the right to complain to the Information Commissioner if you are not happy with any aspect of Practices processing of personal data or believe that we are not meeting our responsibilities as a data controller. The contact details for the Information Commissioner are:

Information Commissioner's Office
Wycliffe House
Water Lane,
Wilmslow SK9 5AF

Website: ico.org.uk

Tel: 0303 123 1113

Appendix 1: Cardiff South West Cluster

Discharge & Wellbeing Integrated Care Hub and Multidisciplinary Team Meetings (MDT) Privacy Notice

This Privacy Notice will explain how the Cardiff South West Cluster uses your personal data for the purposes of the Integrated Care Hub and MDT.

What is the Integrated Care Hub?

Integrated Care Hub is a collaboration between health, social care and the third sector and forms part of the Accelerated Cluster Transformation Project (Project One).

Originally proactively contacting patients discharged from University Hospital of Wales (UHW) and University Hospital Llandough (UHL) to have a 'what matters to you' conversation, the Hub is now the central focus of the Cluster, working with and on behalf of all 9 practices to coordinate care for the population of approximately 75,000 patients. This centralised care is designed to improve service efficiencies and patient safety. The Hub supports the overall aims of the Accelerated Cluster project, which is to reduce hospital admissions and improve the overall wellbeing of patients and staff.

The Integrated Care Hub is based at **Meddygfa Lansdowne Surgery**. The Hub Team includes:

- Administrators from the Community Resource Team (CRT)
- A primary care occupational therapist from the Community Resource Team (CRT) within the Health Board
- A contact officer from Independent Living Services (ILS) at Cardiff Council Local Authority
- Wellbeing Connector from ACE
- Cluster pharmacist/ pharmacy technician from Cardiff and Vale University Health Board
- Cluster project support officer to support the daily running and coordination of the Hub



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- Integrated care navigator to provide administrative support
- Transformation project data analyst employed by C&V University Health Board supports evaluation of the Hub
- Relevant medical information pertaining to your physical and/or mental health
- Reason(s) for referral
- Criminal offences
- Employment, school, social services, housing records

What is MDT?

MDT is a collaboration between health, social care and the third sector and forms part of the Accelerated Cluster Transformation Project (Project One). MDT is designed to bring efficiency to a whole systems approach with effective multi-organisation working to improve patient care and referrals to other healthcare providers. The Cardiff South West Cluster MDT comprises of representatives from primary care (GPs), Cardiff and Vale University Health Board, Cardiff Council for example social workers, and third sector organisations that can support you with your healthcare needs. The purpose of the MDT is to discuss and recommend the best form of treatment and care based on each individual patient's circumstances. As our patient we can refer you into the MDT meeting for further assessment in relation to your care.

What information do we collect about you?

For the purposes of providing your direct care and treatment, we collect the following personal information:

- Your name
- Address
- NHS No.
- Date of Birth
- Gender
- Racial / ethnic origin
- Relevant medical information pertaining to your physical and/or mental health
- Reason(s) for referral
- Criminal offences
- Employment, school, social services, housing records

Partners we may share your information with

To support delivery of the Cluster MDT and Integrated Care Hub, we will share your information, subject to agreement on how it will be used with the following organisation(s). This information will be kept to a minimum (as described above) and may include a brief



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summary of the support that your GP feels will be helpful when making a referral to MDT or Integrated Care Hub:

- Community Resource Team (CRT Health), Cardiff and Vale University Health Board
- Independent Living Services, Cardiff Council
- (Adult) Social Services, Cardiff Council
- ACE (Third Sector)
- Mental Health for Older Persons, Cardiff and Vale University Health Board
- Dietetics, Cardiff and Vale University Health Board
- Care & Repair (Third Sector)
- Age Connect (Third Sector)
- Grow Well Project (Third Sector)
- Tier Zero – MIND (Third Sector)
- Community Care & Wellbeing Service (CCAWS) BAME Counselling Service
- Prehab2Rehab programme (Cardiff & Vale UHB)
- Cardiff Family Advice & Support Services, Cardiff Council

How is your personal information collected?

The information we hold is collected through various routes; these may include:

- Direct interactions with you as our patient and direct input by the clinician involved in your direct care and treatment.
- Indirectly from other health care providers, such as Cardiff and Vale University Health Board.
- When you attend other organisations providing health or social care services for example out of hours GP appointments or visits to A&E and some interactions with Social Care, they will let us know so that your GP record is kept up to date.

How do we use your information?

The information we collect about you, for the purposes of MDT and the Integrated Care Hub, is used for your direct care and treatment, but may also be used for:

- The management of healthcare services
- To contact you about patient surveys
- Anonymised reporting for the purposes of service evaluation and performance

Access and security of your personal information

The sharing of your information will be managed in such a way to assure that it remains confidential, and any organisation that either shares or receives your information has a duty



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of confidentiality and to ensure that the personal data of patients is shared and stored securely.

Your information is securely stored on the practice's IT systems. All users accessing our systems will use a secure username and password to access the system, and all activity performed is fully audited. If any of your information needs to be communicated by email, this is done so using secure NHS Wales email addresses where all information is protected via secure web communication channels.

Referrals to third sector organisations listed above are made via our secure social prescribing system, Elemental, and our secure emailing system.

Retaining and storing your information

We are required by UK law to keep your information and data for a defined period, often referred to as a retention period. The Practice will keep your information in line with the [Records Management Code of Practice for Health and Social Care 2022](#) and the Practice's records management policy which can be found [here](#).

Legal basis for processing your information

The legal basis used to process your personal information, for the purposes of MDT, relates to your direct care and treatment. We rely on the following condition to lawfully process your information:

Article 6(1)(e): *processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.*

For the purposes of MDT, we also process special category information, for example data concerning your health. We rely on the following condition to lawfully process your information:

Article 9(2)(h): *processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and service.*

Article 9(2)(i): *processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices.*

Your rights in relation to MDT and the Integrated Care Hub

The UK GDPR includes a number of rights for individuals. We must generally respond to requests in relation to your rights within one month, although there are some exceptions to



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this. The availability of some of these rights depends on the legal basis that applies in relation to the processing of your personal data. For this Service, the following rights are listed and how they apply are described below.

Right to be Informed

Your right to be informed is met by the provision of this privacy notice, and similar information when we communicate with you directly – at the point of contact.

Right of Access

You have the right to obtain a copy of personal data that we hold about you and other information specified in the UK General Data Protection Regulation (UK GDPR), although there are exceptions to what we are obliged to disclose. A situation in which we may not provide all the information is where in the opinion of an appropriate health professional disclosure would be likely to cause serious harm to your, or somebody else's physical or mental health.

Right to Rectification

You have the right to ask us to rectify any inaccurate data that we hold about you.

Right to Erasure ('right to be forgotten')

You have the right to request that we erase personal data about you that we hold. This is not an absolute right, and depending on the legal basis that applies, we may have overriding legitimate grounds to continue to process the data.

Right to Restriction of Processing

You have the right to request that we restrict processing of personal data about you that we hold. You can ask us to do this for example where you contest the accuracy of the data.

Right to Object

You have the right to object to processing of personal data about you on grounds relating to your particular situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds, unless your object relates to marketing.

How to Contact us

Please contact the Practice if you have any questions about our privacy notice or information, we hold about you.



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Practice Manager, Lansdowne Surgery, 02920 395 115

Practice Manager, Westway Surgery, 02920 592 351

Contact Details of our Data Protection Officer

The Practice is required to appoint a data protection officer (DPO). This is an essential role in facilitating practice accountability and compliance with UK Data Protection Law.

Our Data Protection Officer is:

Digital Health and Care Wales,
Information Governance, Data Protection Officer Support Service
4th Floor, Tŷ Glan-yr-Afon
21 Cowbridge Road East
Cardiff
CF11 9AD
Email: DHCWGMPDPO@wales.nhs.uk

Right to complain to the Information Commissioner

You have the right to complain to the Information Commissioner if you are not happy with any aspect of practices processing of personal data or believe that we are not meeting our responsibilities as a data controller. The contact details for the Information Commissioner are:

Information Commissioner's Office
Wycliffe House
Water Lane,
Wilmslow SK9 5AF

Website: www.ico.org.uk

Tel: 0303 123 1113

Appendix 2: Lifestyle Medicine Project

Cardiff South West Cluster GP Practices

4 Pillar Prescribing Lifestyle Programme - Group Consultations

What is the 4 Pillar Prescribing Lifestyle Programme?

This is a 12-week programme, approved by Cardiff & Vale University Health Board. It involves inviting patients who are pre-diabetic and diabetic to take part in a weekly group lifestyle intervention programme for diabetes and prediabetes. The purpose of the Programme and



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group consultations is to share information about living a healthier lifestyle and to educate the audience on lifestyle intervention

It has been identified that patients may benefit from a group consultation with other patients taking part in a 4 Pillar Prescribing Lifestyle Programme. Patients often present with pre-diabetes or diabetes, but often during busy GP surgery time, GPs are unable to provide the service and time requirement to address with their patients their diet choices and support required to improve. The Cardiff South West Cluster have therefore commissioned Afon Elai Partnership and Locums Dr Avkash Jain and Dr Santhosh Naik, to run a project in developing 4 Pillar Prescribing Lifestyle Programme, free of charge to Cluster patients.

This course will be delivered in group sessions via Microsoft teams and/ individual sessions at Ely Rangers Football Club. An initial consultation will be offered 1-2-1 giving initial leaflet information about the Programme and gaining consent from each patient. The 1-2-1 consultation will also involve obtain initial blood results, such as Hba1c. The group consultation will require participation from each participant to support lifestyle choices and experiences and the initial group session will be a PowerPoint presentation.

There will be collection of data during the course such as weight measurement and lifestyle questionnaires will be repeated mid-course. A full biometric assessment will be repeated at the end of the course. Each participant will receive an individual report on progress.

What information do we collect about you?

Where appropriate as a referral, your information will be shared with the GP delivering the Lifestyle Programme at Lansdowne Surgery. This will be done with your implied consent to share your confidential information. The information shared is your:

- Name
- Date of Birth
- Address
- Telephone contact number
- Email address
- Information about your physical and mental health

How is your personal information collected?

The information we hold is collected through various routes; these may include:

- Direct interactions with you as our patient, the care home and direct input by the clinician involved in your direct care and treatment.
- Indirectly from other health care providers. When you attend other organisations providing health or social care services for example out of hours GP appointments or



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visits to A&E and some interactions with Social Care, they will let us know so that your GP record is kept up to date.

Partners we may share your information with

To support delivery of the 4 Pillar Lifestyle Programme, we will share your information, subject to agreement on how it will be used with the following organisations. This information will be kept to a minimum (as described above) and may include a brief summary of the support that your GP feels will be helpful:

- Afon Elai Partnership
- A GP practice in the South West Cluster

How do we use your information?

The information we collect about you, for the purposes of this Services, is used for your direct care and treatment, but may also be used for:

- The management of healthcare services
- National data collection requirements
- Medical research and clinical audit
- To contact you about patient surveys and patient stories that we use as case studies to capture outcomes and success
- Anonymised reporting for the purposes of service evaluation and performance

Access and security of your personal information

The sharing of your information will be managed in such a way to assure that it remains confidential, and any organisation that either shares or receives your information has a duty of confidentiality and to ensure that the personal data of patients is shared and stored securely.

Your information is securely stored on the practice's IT systems. All users accessing our systems will use their own user accounts, with a secure username and password.

Retaining and storing your information

We are required by UK law to keep your information and data for a defined period, often referred to as a retention period. The Practice will keep your information in line with the practice records management policy which can be found [here](#).

The legal bases for sharing your information under these projects

- **Article 6(1)(e)** - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.



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- **Article 9(2)(h)** - Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and service.

Your rights

The UK GDPR includes a number of rights for individuals. We must generally respond to requests in relation to your rights within one month, although there are some exceptions to this. The availability of some of these rights depends on the legal basis that applies in relation to the processing of your personal data. For this Service, the following rights are listed and how they apply are described below.

Right to be Informed

Your right to be informed is met by the provision of this privacy notice, and similar information when we communicate with you directly – at the point of contact.

Right of Access

You have the right to obtain a copy of personal data that we hold about you and other information specified in the UK General Data Protection Regulation (UK GDPR), although there are exceptions to what we are obliged to disclose. A situation in which we may not provide all the information is where in the opinion of an appropriate health professional disclosure would be likely to cause serious harm to your, or somebody else's physical or mental health.

Right to Rectification

You have the right to ask us to rectify any inaccurate data that we hold about you.

Right to Restriction of Processing

You have the right to request that we restrict processing of personal data about you that we hold. You can ask us to do this for example where you contest the accuracy of the data.

Right to Object

You have the right to object to processing of personal data about you on grounds relating to your particular situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds, unless your object relates to marketing.

Right to complain to the Information Commissioner

You have the right to complain to the Information Commissioner if you are not happy with any aspect of practices processing of personal data or believe that we are not meeting our

responsibilities as a data controller. The contact details for the Information Commissioner are:

Information Commissioner's Office
Wycliffe House
Water Lane,
Wilmslow SK9 5AF

Website: www.ico.org.uk

Tel: 0303 123 1113

Appendix 3: Prehab2Rehab – Health Optimisation

Cardiff South West Cluster GP Practices

What is Prehab2Rehab?

The Prehab2Rehab service sets out to optimise our Cardiff and Vale residents who have been referred to hospital for investigation and possible treatment with regards to their existing health and well-being. This process will start in the primary care setting.

The service will be offered at the time when a person presents to their GP with red flag alarm symptoms of cancer, necessitating a referral by their GP for cancer investigations in secondary care. The service phase will pilot within the 9 GP practices located in the SW Cardiff Cluster.

What information do we collect about you?

For the purposes of providing your direct care and treatment, we collect the following personal information:

- Your name
- Address
- NHS No.
- Date of Birth
- Gender
- Racial / ethnic origin
- Relevant medical information pertaining to your physical and/or mental health
- Reason(s) for referral
- Criminal offences
- Employment, school, social services, housing records

How is your personal information collected?



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The information we hold is collected through various routes; these may include:

- Direct interactions with you as our patient, the care home and direct input by the clinician involved in your direct care and treatment.
- Indirectly from other health care providers. When you attend other organisations providing health or social care services for example out of hours GP appointments or visits to A&E and some interactions with Social Care, they will let us know so that your GP record is kept up to date.

Partners we may share your information with

To support delivery of the Prehab2Rehab, we will share your information, subject to agreement on how it will be used with the following organisation(s). This information will be kept to a minimum (as described above) and may include a brief summary of the support that your GP feels will be helpful when making a referral:

- Community Resource Team (CRT Health), Cardiff and Vale University Health Board
- Independent Living Services, Cardiff Council
- (Adult) Social Services, Cardiff Council
- ACE (Third Sector)
- Mental Health for Older Persons, Cardiff and Vale University Health Board
- Dietetics, Cardiff and Vale University Health Board
- Care & Repair (Third Sector)
- Age Connect (Third Sector)
- Grow Well Project (Third Sector)
- Tier Zero – MIND (Third Sector)
- Community Care & Wellbeing Service (CCAWS) BAME Counselling Service
- Prehab2Rehab programme (Cardiff & Vale UHB)
- Cardiff Wellbeing Service (Third Sector)
- Active Leisure Scheme (Third Sector)
- National Exercise Referral Scheme (Third Sector)
- Cardiff City Fitfans

How do we use your information?

The information we collect about you, for the purposes of this Services, is used for your direct care and treatment, but may also be used for:

- The management of healthcare services
- To contact you about patient surveys
- Anonymised reporting for the purposes of service evaluation and performance

Access and security of your personal information



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The sharing of your information will be managed in such a way to assure that it remains confidential, and any organisation that either shares or receives your information has a duty of confidentiality and to ensure that the personal data of patients is shared and stored securely.

Your information is securely stored on the practice's IT systems. All users accessing our systems will use their own user accounts, with a secure username and password.

Retaining and storing your information

We are required by UK law to keep your information and data for a defined period, often referred to as a retention period. The Practice will keep your information in line with the practice records management policy which can be found [here](#).

The legal bases for sharing your information under these projects

- **Article 6(1)(e)** - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- **Article 9(2)(h)** - Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and service.

Your rights

The UK GDPR includes a number of rights for individuals. We must generally respond to requests in relation to your rights within one month, although there are some exceptions to this. The availability of some of these rights depends on the legal basis that applies in relation to the processing of your personal data. For this Service, the following rights are listed and how they apply are described below.

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You have the right to obtain a copy of personal data that we hold about you and other information specified in the UK General Data Protection Regulation (UK GDPR), although there are exceptions to what we are obliged to disclose. A situation in which we may not provide all the information is where in the opinion of an appropriate health professional disclosure would be likely to cause serious harm to your, or somebody else's physical or mental health.



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Right to Rectification

You have the right to ask us to rectify any inaccurate data that we hold about you.

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You have the right to request that we restrict processing of personal data about you that we hold. You can ask us to do this for example where you contest the accuracy of the data.

Right to Object

You have the right to object to processing of personal data about you on grounds relating to your particular situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds, unless your object relates to marketing.

Right to complain to the Information Commissioner

You have the right to complain to the Information Commissioner if you are not happy with any aspect of practices processing of personal data or believe that we are not meeting our responsibilities as a data controller. The contact details for the Information Commissioner are:

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