

Privacy policy

How we process your personal data



Introduction

Data Protection Laws set out the obligations Accelerate CIC has to you for the processing of your Personal Data. When we use or disclose your personal data we will comply with these Laws.

Your Personal Data is data which by itself or with other data available to Accelerate CIC (Accelerate) can be used to identify you as an individual. Accelerate is the Data Controller. This Privacy Notice sets out how Accelerate will use your personal data. You can contact our Data Protection Officer (DPO) at Centenary Wing, St Josephs Hospice Mare Street, Hackney, London E4 8AS.6JL, if you have any questions.

The types of personal data we collect and use

We will use your personal data for the reasons set out below. We will collect most of this directly during your registration but there may be sources of personal data collected indirectly as set out later in this document. The personal data we use may include:

- Your name, address and contact details, including email address and home and mobile telephone numbers. If you provide these details, we may use them to contact you unless you ask us not to. This could include emails, text or voicemail messages;
- · Date of birth and gender;
- Your previous and current medical health records whether provided by yourself or other third parties such as your GP;
- The terms and conditions of your contract with us for the provision of healthcare and related services;
- Your bank details/credit/debit card if you are registering for a course with the Academy
- We will take a swipe of your debit or credit card. We will let you know if we intend to take a payment from this card before we do so;
- Information about your marital status, next of kin, dependants nominated and/or emergency contacts;
- Information about your nationality and entitlement to treatment in the UK;
- Information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;

 Equal opportunity monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief; and

HCA UK may collect this information in a variety of ways. For example, data might be collected through Referral Forms and Assessment forms obtained from the health professional making your referral or from yourself when attending our clinic.

In some cases, the organisation may collect personal data about you from third parties, such as other healthcare providers.

Providing your personal data

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases, we need you to provide your personal data so we can provide care and treatment to you.

Monitoring of communications

Subject to applicable laws, we may monitor and record telephone calls, emails, text messages, social media messages and other communications in relation to our dealings with you. We will do this to ensure an appropriate standard of care, for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of our communications networks and systems, to check for unlawful content, obscene or profane content, for quality control and staff training, and when we need to see a record of what has been said. We may also monitor activities on our network and systems where necessary for these reasons and this is for our legitimate interests or other legal obligations.



Using your personal data and the legal basis for processing

We use your personal data to support the provision of your healthcare in the following ways:

- To support the provision of your healthcare;
- · To decide how best to provide treatment to you;
- To take steps at your request during the course of your treatment;
- · To keep your records up to date;

We will process your personal data under Article 6 (1) f of the General Data Protection Regulations:

- As necessary for our own legitimate interests or those of other persons and organisations;
- For good governance, accounting, and managing and auditing our clinical and business operations both internally and by third parties;
- For surveys of patient experience and quality of care;
- To monitor emails, calls, other communications, and activities on Accelerate networks and systems;
- For market research, other surveys and analysis and developing statistics for improving clinical performance; and as necessary to comply with a legal obligation:
- When you exercise your rights under data protection law and make requests;
- For compliance with legal and regulatory requirements and related disclosures;
- · For establishment and defence of legal rights;
- For activities relating to the prevention, detection and investigation of crime;
- To verify your identity, make credit fraud prevention and anti-money laundering checks; and
- To investigate complaints, legal claims and data protection or clinical incidents.

Based on your consent:

With your next of kin or other nominated contact;

- If you ask us to disclose your personal data to other people or organisations such as a company handling a claim on your behalf; or otherwise agree to disclosures;
- With third parties including pharmaceutical companies and Universities and other research bodies for scientific research;
- When we process any special categories of personal data about you at your request (e.g. racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning your health, sex life or sexual orientation).

You are free at any time to change your mind and withdraw your consent. We will advise you if the consequence of doing so is that we cannot continue to provide full healthcare services to you.

Sharing of your personal data

Subject to applicable data protection laws we may share your personal data with:

- Consultants/Doctors and other healthcare professionals who provide treatment to you at our facilities;
- Other healthcare providers including your General Practitioner (GP) where we believe this will enhance the quality of your care. Let us know if you do not wish us to share information with your GP;
- Sub-contractors and other persons who help us to provide healthcare products and services to you;
- Companies and other persons including interpreters providing services to you as part of your extended care and post care follow-up;
- Our legal and other professional advisors, where appropriate and required
- Fraud prevention agencies, credit reference agencies, and debt collection agencies;
- Government bodies and agencies in the UK and overseas (e.g. HMRC who may in turn share it with relevant overseas tax authorities and with regulators including the Information Commissioner's Office and Care Quality Commission (CQC);



- General Medical Council and other professional bodies;
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect your vital interests;
- To protect the security or integrity of our business operations and other patients;
- · Payment systems and providers; and
- Anyone else where we have your consent or as required by law

Accelerate ensures all the information it holds is kept safe and confidential.

Sharing of your personal data for scientific research purposes

Subject to applicable data protection laws and your explicit written consent we may share your personal data for the purpose of scientific research.

Sharing of your personal data for marketing purposes

Subject to obtaining your written consent and communications preferences we may use your contact details to send you newsletters and other information on new Facilities, services and treatments which we think may be of interest to you. We will not sell your personal data to a third party without your written consent.

You are free at any time to change your mind and withdraw your consent. Please contact hello@acceleratecic.com. This will not affect the healthcare services we provide to you.

How long do we keep your data?

Information will be kept in accordance with the retention periods outlined in the Information Governance Alliance (IGA) Records Management Code of Practice for Health and Social Care (2016). Information may be held for longer periods where the following apply:

Retention in case of queries

We will retain your personal data as long as necessary to deal with any queries you may have;

Retention in case of claims

We will retain your personal data for as long as you might legally bring claims against us; and

Retention in accordance with legal and regulatory requirements

We will retain your persona I data after you have received healthcare services at our Facilities based on our legal and regulatory requirements and obligations.

Your rights under applicable data protection law

Your rights are as follows (noting that these rights do not apply in all circumstances):

- The right to be informed about processing of your personal data;
- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased (the "right to be forgotten");
- The right to request access to your personal data and information about how we process it;
- The right to move, copy or transfer your personal data ("data portability"); and
- Rights in relation to automated decision making including profiling

You may exercise these rights by contacting us on hello@acceleratecic.com.

You have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law <u>ico.org.uk</u>.



How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

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Users are recommended to take appropriate safeguards before downloading information from this website.

Access to information

Accelerate will not share your confidential information with anyone outside of Accelerate without your consent so to do. You are prohibited from posting or transmitting, to and from, the website any unlawful, threatening, defamatory, obscene, and pornographic or other material which would violate any law.

Unless otherwise specified, the materials on this website are directed solely at those who access this website from the United Kingdom mainland. Accelerate makes no representation that any information, product or services referred to in the materials on this website are appropriate for use, or available, in other locations. Those who choose to access this website from other locations are responsible for compliance with local laws if and to the extent local laws are applicable.



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We are committed to respecting and protecting your privacy when we deal with your personal information. The privacy notice gives you details on the information we collect about you, how we protect and use it, and your rights. If you have any questions about how we use your information, please email us at hello@acceleratecic.com for the attention of Sarah Smith.

Further information can be provided from our Data Protection Officer by email. Please address your email for the attention of Sarah Smith DPO to hello@acceleratecic.com

Last updated: May 2021