

CITI HEALTH LLP

OUR PRIVACY POLICY

We are committed to respecting and protecting your privacy when we deal with your personal information. The following 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 contact@citihealth.co.uk.

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 the registration and/or admission process but there may be sources of personal data collected indirectly as set out later in this policy. The personal data we use may include:

- Your name, address and contact details, including email address and home and mobile telephone numbers, date of birth and gender
- Your previous and current medical health records whether provided by Citi Health LLP or other third parties
- The terms and conditions of your contract with us for the provision of healthcare and related services
- Your financial information of the company or individual who is responsible for the payment of invoices/bills relating to your care (e.g. insurer or sponsor)
- 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
- Information about medical or health conditions of your family
- Information received in response to any surveys or, complaints claims
- equal opportunity monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief
- Information about how you use our website.

This data may also include visual images, personal appearance and behaviour e.g. where CCTV is used as part of our building security measures.

Citi Health LLP may collect this information in a variety of ways. For example, data might be collected through Registration and Admission forms; obtained from your passport or other identity documents such as your driving licence; from online web forms completed by you at the start of your treatment; from correspondence with you; through the Admission and Registration process or through interviews, meetings or other assessments.

In some cases, the organisation may collect personal data about you from third parties, such as insurer providers, referral agencies, sponsors, checks permitted by law.

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 and receive payment for these services.

Using your personal data and the legal basis for processing

We will process your personal data under Article 6 (1); Article 9 (2) of the General Data Protection Regulations:

- To support the provision of your healthcare
- To decide how best to provide treatment to you
- As necessary to support the healthcare contract with you and to allow us to receive [full] payment for those services
- 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, e.g.:
- For good governance, accounting, and managing and auditing our clinical and business operations
- To monitor emails, calls, other communications, and activities on Citi Health LLP networks and systems
- For market research, 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 Laws 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

- 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;
- 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. The consequence might be that we cannot continue to provide full healthcare services to you.

Who we may share your personal data with

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 or your facilities
- Other healthcare providers where we feel this will enhance the quality of your care

- Sub-contractors and other persons who help us to provide healthcare products and services to you
- Companies and other persons providing services to you as part of your extended care;
- Our legal and other professional advisors, including our auditors
- 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, the Information Commissioner's Office (ICO))
- 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
- When we restructure or sell our business or its assets or have a merger or re-organisation
- Payment systems and providers; and

Anyone else where we have your consent or as required by law

Sharing of your personal data to contribute to the review and publishing of information about the quality and cost of privately funded healthcare

Security of personal Data

We take our duty to protect your personal information and confidentiality very seriously and we are committed to taking all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, whether computerised or on paper. Where we have a need to transfer data outside of the European Economic Area (EEA) we do so with appropriate safeguards in place.

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
- Retention in accordance with legal and regulatory requirements. We will retain your personal data after you have received healthcare services at our facilities based on our legal and regulatory requirements.

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')
- Rights in relation to automated decision making including profiling

You may exercise these rights by emailing us via contact@citihealth.co.uk.

You have the right to complain to the [Information Commissioner's Office \(ICO\)](https://ico.org.uk/) which can be found at <https://ico.org.uk/>. It has enforcement powers and can investigate compliance with data protection law.

Your Personal Data is data which by itself or with other data available to Citi Health LLP can be used to identify you as an individual. Citi Health is the data controller. This privacy notice sets out how Citi Health will use your personal data. You can [contact our Data Protection Officer \(DPO\)](#) at 157a North View Road London N8 7ND, or via contact@citihealth.co.uk if you have any questions.

Automated technologies or interactions.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

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Although every reasonable effort is made to ensure that files are free of defects and viruses, there are no guarantees that they are free from defects or computer viruses. Therefore, no warranty or guarantee is given by Citi Health LLP, regarding files downloaded or accessed through Citi Health LLP website.

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Website security

Whilst Citi Health LLP makes all reasonable attempts to exclude viruses from the website, we cannot guarantee that the website will be virus free and accept no liability in the unlikely event that the website is not virus free.

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

Access to information

Citi Health LLP will not share your confidential information with anyone outside of Citi Health LLP. 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.

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Although the website has been tested and should work correctly under normal circumstances, there are many factors both within and outside of the control of Citi Health LLP which may prevent the website from being available. No responsibility is accepted by Citi Health LLP, for any losses howsoever caused that may arise from an inability to access or to access resources through its website.

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