



# Introduction

## 1. About Us

H&B Health Ltd is a collaboration of GP practices in the Hoddesdon & Broxbourne area, delivering Primary Care services to the population of Southeast Hertfordshire. Our practices work together to improve access, service delivery, and outcomes for patients in an evolving healthcare environment.

H&B Health Ltd is the **Data Controller** for the personal information we collect or receive about you in relation to our services. We are registered with the Information Commissioner's Office (ICO) under registration number **ZB315397**.

## 2. Contact Information

### A. Data Controller Contact

Richard Moore

Email: [richard.moore12@nhs.net](mailto:richard.moore12@nhs.net)

Please use this contact if you:

- Have questions about how we are processing your personal data
- Want to access or amend your personal information
- Wish to exercise any of your data rights as defined in the General Data Protection Regulation

**B. Complaints** If you are unhappy with how your personal data is processed, please contact the Data Controller using the contact details provided above and if unresolved, contact our independent **Data Protection Officer (DPO)**:

**Tania Palmariellodiviney**

Data Privacy Simplified Ltd

Email: [dpo@dataprivacysimplified.co.uk](mailto:dpo@dataprivacysimplified.co.uk)

You also have the right to raise a concern with the **Information Commissioner's Office (ICO)**: [ico.org.uk](https://ico.org.uk) | Tel: 0303 123 1113

# Purpose

As part of the services we provide, we are required to process personal data about our service user / patients and in some instances, their friends' and / or relatives' personal data.



“Processing” may include collecting, recording, organising, storing, sharing and disposing once further processing is not justified by the purpose of the collection.

We are fully committed to being transparent about why we need your personal data and what we do with it. All the information is included in this policy also stating the rights individuals have in relation to their personal data.

## Scope

This policy applies to all our service users, patients, potential service users / patients and possibly their legal representatives for example guardians, relatives or friends.

## Patients

### The Data We Collect

We collect the following types of information:

- Basic personal details: name, date of birth, address, contact information and NOK
- Special category data: health and social care information, which may include both physical and mental health data.
- We may also record data about your race and ethnic group

This data may be collected from you directly, from your GP practice, or from other health and care providers.

## Lawful Bases for Processing Your Information

As required by the UK GDPR we rely on the following legal bases for processing your personal data:

- **Article 6(1)(e)** – Public task: providing healthcare services as a public duty
- **Article 6(1)(c)** – Legal obligation: e.g., safeguarding, court orders other legal claims, possibly audits
- **Article 6(1)(a)** – Consent: we may use your consent as a legal basis for processing your personal data for sending you newsletters for example

For processing special category (health) data we rely on:



- **Article 9(2)(h)** – Necessary for the provision of health or social care
- **Article 9(2)(i)** – Necessary for public health purposes
- **Article 9(2)(a)** – Explicit consent, e.g. research participation, which could be withdrawn as defined by the UK GDPR

## How We Use Your Information?

### **A. For the purpose of Direct Care Services** we use your personal data to:

- Provide services like Enhanced Access and health related vaccinations
- Refer you to other healthcare providers
- Share test results with relevant services
- Inform your GP practice about your care with us

Adhering to the UK GDPR we maintain data sharing agreements with the local Integrated Care Board (ICB) and the GP practices using tools like **My Care Record** to enable safe and lawful sharing.

All communications are through the NHS.Net secure email portal

**B. Technical and Support Services:** We may share data with third-party processors for administrative and technical support. With all our processors we have data processing agreements in place with clearly defined instruction of how the personal data must be processed, ensuring that the organisational and technical measures are in place and maintained up to the standards of the statutory legislation.

The clinical IT platforms we use include: SystmOne and Accurx

**C. Non-Direct Care (Secondary Uses)** Your anonymised or pseudonymised data may be used for:

- Health service planning and improvement
- Public health monitoring
- NHS research (only with your explicit consent)

You can opt out of data sharing for these purposes via the **National Data Opt-Out**, link [HERE](#).

**D. Legal Requirements** We may share your information when legally required, only the minimum required for a particular case, such as for:

- Safeguarding issues

- Public health emergencies
- Court orders, legal claims or any other complaints
- Audit purposes (eg regulatory body, CQC)

## Individuals' Rights

UK GDPR defines the rights individuals have relating to their personal data, which we full adhere:

- **Right to be informed** of how we process your personal data
- **Right of Access:** To access and receive a copy of your data
- **Right to Rectification:** To correct inaccurate or incomplete data
- **Right to Restriction:** To limit how your data is used while concerns are resolved
- **Right to Object:** To object to specific uses of your data (e.g., non-direct care)
- **Right to Erasure ('Right to be Forgotten'):** this is not absolute right and it is applicable only under certain circumstances for example when individuals withdraw their consent or if the data was processed unlawfully.
- **Right to Portability:** Only where data processing is based on consent or contract when data must be transmitted to another controller, for example one private healthcare provider to another (rarely applies in Primary Care)
- **Right not to be subject to automated decision making and profiling**

To exercise your rights, please contact the Data Controller. Requests may be submitted verbally, over the phone or in writing. All requests are subject to ID verification prior we hand over the information requested. Adhering to the UK GDPR requirements we provide response within one calendar month, extended to 2 additional months in case of an excessive or too complex access requests, advising the data subject accordingly within the first month.

**Children's personal data** is processed with appropriate safeguards. Parental involvement or consent maybe required for children younger than 13 years of age.

## Data Security and Retention

The data we process is securely stored in the UK. We strictly follow the NHS Records Management Code of Practice for data retention and ensure that your data is not kept longer than necessary. Some records may be digital-only.

## Cookies and Website Use

---

Our website may use cookies to improve your personal experience. Essential cookies cannot be disabled by default; however, the additional cookies may be accepted or declined as per your preferences. For further details please see our **Cookie Policy** published on our website.

## Monitoring

---

This policy will be regularly monitored, reviewed and updated annually if required in accordance with the legislation changes or any changes implemented in our processing activities.

---

### Appendix 1: Member GP Practices

- Amwell Surgery
- Hailey View Surgery
- Park Lane Surgery
- The Limes Surgery

For more information, please speak to your GP or contact H&B Health Ltd, website link <https://www.handbhealth.co.uk/>.