

PINN MEDICAL CENTRE PATIENTS' ASSOCIATION

GENERAL DATA PROTECTION REGULATION 2018

PRIVACY NOTICE

Introduction

1 This document is the Privacy Notice of the Pinn Medical Centre Patients' Association (PMCPA) prepared as required by the General Data Protection Regulation (the Regulations) from 25 May 2018. The Notice contains details on:

- The PMCPA Registration with the Information Commissioner's Office;
- The purpose of our information processing;
- The security of our information processing;
- The personal data we collect and use;
- Sharing and transferring your data;
- The lawful basis of our processing;
- Your consent to the use of your data;
- Your rights over your personal data.

The PMCPA Registration with the Information Commissioner's Office

2 The PMCPA has been registered with the Information Commissioner's Office (ICO) with effect from 17 April 2018 under Registration Reference ZA343663. That registration describes the personal data being processed by the PMCPA as a Data Controller. This Notice summarises that description and adds further details. The full description is available on the ICO website (ico.org.uk), and the PMCPA website (pinnpatients.org) or from the Secretary as below.

3 The contact point for queries, comments or further information is the Secretary, George Bardwell, at secretary@pinnpatients.org, or at
The Secretary,
Pinn Medical Centre Patients' Association,
c/o Pinn Medical Centre,
37 Love Lane,
Pinner. HA5 3EE.

The purpose of our information processing

4 The PMCPA processes personal information to enable it to provide a voluntary service for the benefit of patients of the Pinn Medical Centre (PMC), as set out in its constitution. This includes administering membership records; advising members about future events including Board Meetings, the Annual General Meeting and lectures etc; managing volunteers and their work, especially the transport service; maintaining distribution lists for the Pinn Piper; verifying with the PMC that members, especially new members, are patients of the PMC; and occasional fundraising. The PMCPA also provides information to specific sub-groups of members, for example Board Members/Trustees and volunteers. This is to allow them to conduct the affairs of the Patients' Association, including its voluntary services.

The security of our information processing

5 All the data we hold is password protected, with passwords being made available only to Trustees, Board Members and those managing our voluntary services (who are themselves members of the Association). There is a single copy of the members' database, stored in the Cloud, and we secure that data using industry standard authentication. In addition all those accessing your data are obliged to abide by our Data Security Policy (which can be found on our website) and have signed a Code of Conduct which reminds them that all members' information is confidential. And that they may access it only by using a private, rather than a public, computer and that the computer is itself password protected. The data is backed up by the organisations providing data processing services - see below.

The personal data we collect and use

6 The data on members we collect and use in respect of virtually all our information processing is restricted to members' names and contact details. And it is used for the most part by way of mass circulation (by blind copy emails) to all members by the Chair or Secretary on behalf of the Board, and by those organising our voluntary activities. We also record membership details such as the date of giving consent to processing and their preferred type of communication, their preferred method of delivery of the Pinn Piper; their date of first registration, and whether or not they are volunteers or Trustees. The full set of items in our members' database is set out in the Annex to this Privacy Notice.

Sharing and transferring your data

7 We sometimes need to share the personal information we hold about our members with individuals or organisations. Where this is necessary we seek to ensure that they are complying with all aspects of the Data Protection Act 1998 and the General Data Protection Regulation. In particular we share information with:

- PMCPA Trustees, Board Members and Volunteers - to carry on the work of the Association; and
- The Pinn Medical Centre - but only to verify that our members are patients of the practice.

8 Our members' data is processed by a number of data processors - organisations that provide data processing services to us. These are:

- Google Suite and Gapps Experts, Shared Contacts for Gmail - which manage our Gmail contact list; and
- R and S Services - which manages our database.

We do not actively transfer any information outside the EU and our data processors are obliged to comply with the General Data Protection Regulation.

The lawful basis of our processing

9 Under the Regulations organisations are obliged to determine the lawful basis under which they are processing data. The Board has decided that, not least because the Association is a voluntary organisation, it should carry out its

information processing on the basis of Consent. - defined as *“the individual has given clear consent (for you) to process their personal data for a specific purpose”*.

Your Consent to the use of your data

10 Since September 2016 new members have registered with the Association either by completing an application form seeking their contact details (for example following a visit to our stall at the Pinner Village Fair); or by going to our website and completing and submitting an online application form. In both cases new members are asked to specify the means by which we can communicate with them (post or email) and informed that they can contact us to ask for their information to be updated or removed at any time. For this group of members the Board sees the application process as satisfying the requirements of the Regulations as regards giving valid consent. Nevertheless all members in this category (registered after September 2016) will be contacted individually informing them of the basis on which their data is being processed, and that they may withdraw this consent at any time.

11 Our membership records for those registering prior to September 2016 contain no information as to the date of registration, nor any indication of whether or not consent to communications and processing was explicitly given. This group of members will be contacted individually and asked to give clear consent to the processing of their data, and asked to specify the means by which the Association may contact them.

Your rights over your personal data

12 Under the regulations you have the following rights in respect of the use of your data:

- The right to be informed about the processing of your information (which is as set out in this Notice);
- The right of access to your data - at any time you may ask the Secretary of the Association to provide you with a copy of the information held on you, and the Board has decided that no charge will be made for supplying this information;
- The right to correct or amend any of your information; to have your details removed from our records; and to restrict the use we make of your information - all by contacting the Secretary.

13 As indicated in paragraph 3 above, the contact point for queries, comments or further information is the Secretary, George Bardwell, at secretary@pinnpatients.org, or by post to the Pinn Medical Centre.

PMCPA May 2018

Pinn Medical Centre Patients' Association Members' Database

The following items are included, with an indication of any options offered:

Title Mr Mrs Miss Ms Dr other

Surname/Family Name

First Names

Postal Address

First Line

Second Line

Third Line

Postcode

Email Address

Telephone Number

Pinn Piper Delivery

Email? Yes/No

Household delivery? Yes/No

Consent to Processing/Communications

Date Given DD/MM/YY

Email? Yes/No

Post? Yes/No

Telephone? Yes/No

Date of First Registration DD/MM/YY

Source of Application Description

Date and Type of Acknowledgment DD/MM/YY, Description

Voluntary Activity? Description (eg Driver, Pinn Piper delivery, lecture, donation)

Trustee? Yes (with dates)/No

PMCPA Officer? Yes (with office and dates)/No