Bromley GP Alliance
Kelsey Park Farmhouse, 379 Croydon Road,
Beckenham, BR3 3QL

# IG04
# Privacy Notice for member GP Practice Staff

**Next review date: November 2026**

## Version Control

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We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities if you have a complaint.

When we use your personal data, we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the UK) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

## Key terms

It would be helpful to start by explaining some key terms used in this policy:

| **We, us, our** | **Bromley GP Alliance Ltd, Bromley Community Education Provider Network and Bromley Primary Care Academy** |
|---|---|
| Our data protection lead | Umar Sabat IG Health<br>umar.sabat@ig-health.co.uk |
| Personal data | Any information relating to an identified or identifiable individual |
| Special category personal data | Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership<br>Genetic and biometric data<br>Data concerning health, sex life or sexual orientation |

## Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of advising and/or acting for you. It also covers data that we will or may collect as part of our business relationship with you, for example in relation to introductions or recommendations.

| **Personal data we will collect** | **Personal data we may collect depending on our relationship with you e.g. as a shareholder, locum GP or member of practice staff** |
|---|---|
| Your name, address and telephone number | Information to enable us to check and verify your identity. |
| Electronic contact details, e.g. your email address and mobile phone number | Information about your use of our IT, communication and other systems, and other monitoring information<br><br>Details of your professional online presence, e.g. LinkedIn profile<br><br>Professional registrations<br><br>Education and training<br><br>Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs |

This personal data is required to enable us to provide our service and support to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

## How your personal data is collected

We collect most of this information from you. However, we may also collect information:

- directly from a third party,
- from a third party with your consent,
- your employer and/or trade union, professional body or pension administrators;
- via our website—we use cookies on our website
- via our information technology (IT) systems, e.g.: booking systems, e.g clinical systems, booking systems, AI-supported tools such as Heidi AI
- door entry systems and reception logs;
- automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

## How and why, we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

| **What we use your personal data for** | **Our reasons** |
|---|---|
| To provide services to you and your patients | For the performance of our contracts for the provision of services, and to comply with legal and regulatory obligations |
| Conducting checks verify identity<br><br>Screening for professional registration compliance. | To comply with our legal and regulatory obligations |

| What we use your personal data for | Our reasons |
|---|---|
| Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation | |
| Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies | To comply with our legal and regulatory obligations |
| Ensuring business policies are adhered to, eg policies covering security and internet use | For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures |
| Operational reasons, such as improving efficiency, training and quality control | For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the right service for you and your patients |
| Use of AI-supported tools such as Heidi AI | For our legitimate interests in improving efficiency and reducing administrative burden, whilst maintaining safe and accurate records |
| Ensuring the confidentiality of commercially sensitive information | For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information<br><br>To comply with our legal and regulatory obligations |
| Statistical analysis to help us manage our organisation, e.g. in relation to our financial performance, membership base, work type or other efficiency measures | For our legitimate interests or those of a third party, i.e. to be as efficient and safe as we can so we can deliver the right service for you and your patients |
| Preventing unauthorised access and modifications to systems | For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you<br><br>To comply with our legal and regulatory obligations |
| Updating and enhancing records | To comply with our legal and regulatory obligations |
| Statutory returns | To comply with our legal and regulatory obligations |
| Ensuring safe working practices, staff administration and assessments | To comply with our legal and regulatory obligations |

| What we use your personal data for | Our reasons |
|---|---|
| | For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the right service to you and your patients |
| Marketing our services to:<br>• shareholders<br>• third parties who have previously expressed an interest in our services;<br>• third parties with whom we have had no previous dealings.<br>• Practice staff<br>• GPs | |
| External audits and quality checks, e.g. CQC, CCG | For our legitimate interests or a those of a third party, i.e. to maintain our contracts so we can demonstrate we operate a safe effective service<br><br>To comply with our legal and regulatory obligations |

The above table does not apply to special category personal data, which we will only process with your explicit consent.

## Marketing communications

We may use your personal data to send you updates (by email, text message, telephone or post) about developments that might be of interest to you and/or information about our services and events.

We have a legitimate interest in processing your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never share it with other organisations outside of Bromley GP Alliance Ltd for marketing purposes.

You have the right to opt out of receiving marketing communications at any time by emailing selicb.bgpacorporate@nhs.net

We may ask you to confirm or update your marketing preferences if we provide additional services in the future, or if there are changes in the law, regulation or the structure of our business.

## Who we share your personal data with

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

## Where your personal data is held

Information will be held at our offices.

## How long your personal data will be kept

We will keep your personal data in accordance with our data retention Policy.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data. For further details on this please contact our data protection lead.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

## Your rights

You have the following rights, which you can exercise free of charge:

| | |
|---|---|
| Access | The right to be provided with a copy of your personal data |
| Rectification | The right to require us to correct any mistakes in your personal data |
| To be forgotten | The right to require us to delete your personal data—in certain situations |
| Restriction of processing | The right to require us to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data |
| Data portability | The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations |
| To object | The right to object:<br>• at any time to your personal data being processed for direct marketing (including profiling); |

| | |
|---|---|
| | • in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests. |
| Not to be subject to automated individual decision-making | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you |

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and
- let us have enough information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

## Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/make-a-complaint/or telephone: 0303 123 1113.

## Data Protection Officer

We have a data protection officer who is independently appointed. He can be contacted on umar.sabat@ig-health.co.uk

## Changes to this privacy policy

This privacy policy was published on 20th May 2018

We may change this privacy policy from time to time, when we do, we will inform you via email.

## How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Bromley GP Alliance Ltd
Kelsey Park Farmhouse
379 Croydon Road
Beckenham
BR3 3QL
Tel: 0203 9728308
Selicb.bgpacorporate@nhs.net