



MDG

Privacy Notice

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Job Title: Resources Director

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**ISO
27001**

Information
Security
Management
Certification

1 Document Version History

Version	Date	Authors	Reviewers	Comments
1.00	23/04/2018	KFJ	SMT	New statement in line with GDPR
1.10	06/11/2018	KFJ	SMT	Specific reference to SARS
1.20	14/08/2019	KFJ	SMT	Update consent section
1.30	28/02/2020	KFJ	MDG Leadership team	Update to section 12 to enhance detail

2 Document Overview

Data Classification	Public
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Audience	MDG Team
Author(s)	Karen Forbes-Jackson & Mark Tate
Owner	Karen Forbes-Jackson
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3 Document Approval

Title/Role	Name	Signature	Date
MDG Board	Gavin Sampson		02/03/2020

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4 Introduction

MDG has a legal duty to ensure we protect the information we collect and process on behalf of our clients. To do this we have developed and maintain a range of policies and procedures that collect, store and transfer information in a safe and secure manner. Within this Privacy Notice we aim to make clear to customers what we do with the information we collect.

Mishandled information can have serious repercussions for MDG, including; damaging relations and reputation, fraud, breaches of the General Data Protection Regulation, financial penalties and loss of business. MDG therefore takes its responsibilities in this area seriously.

If you have a question or have comments on this Notice, then please contact our Karen Forbes-Jackson, Resources Director on kforbes-jackson@medicalsdirectgroup.co.uk or by calling 0800 9800 633.

5 Your Rights Explained

The General Data Protection Regulation provides customers with a specific set of legal rights over your personal and sensitive data. You are entitled to ask us to:

- Provide you with a copy of your personal information. This allows you to see how and why we are using your information and that we are doing so lawfully. This is commonly known as a Subject Access Request and must be replied to within one month of receipt.
- Correct your personal information if you think it is wrong or incomplete. We will take reasonable steps to check and correct your information.
- To erase your personal information and prevent processing in specific circumstances, often referred to as the 'Right to be Forgotten'.
- To 'block' or suppress the processing of personal data in specific circumstances.
- To provide you with your personal data in a format which can be used across different IT environments, in specific circumstances.
- To accept your objection to your personal data being processed. This also applies in certain circumstances.

You also have the Right to be Informed. This means that when we collect personal information from you we will explain our purposes for processing your personal data, our retention periods for that personal data, and who it will be shared with (which we do in this Notice)

You also have rights in relation to automated decision making, including profiling. We do not use automated decision making in relation to the collection of your information in support of your claim or policy.

6 Who is MDG?

MDG is registered as Medicals Direct Screenings Ltd & Medicals Direct Group Ltd with Company House:

Premiere House, 5th Floor
Elstree Way
Borehamwood
Hertfordshire
WD6 1JH

Company Number – 02706045 & 03097124
Data Protection Lead – Karen Forbes-Jackson

MDG is a wholly owned SME business working within the Premier Medical Holdings Group.

7 What do MDG do?

MDG collect health, wellbeing and medical history information on behalf of our clients, the Data Controller. The Data Controller could be an insurer, employer or health care/claim management organisation. We are instructed to collect specific data from the customer and will not ask the customer for any more data than has been requested of us. This makes MDG the Data Processor. Data we will normally collect can include:

- Personal Data, for example, name, address, date of birth & gender, and
- Special Category Personal Data, for example, medical history, family health and life style information, for example, alcohol and drug intake.

We collect data using staff employed by us directly, through our network of medical professionals, via the customers own GP and contracted UK and Irish laboratories, who will analyse any samples taken.

The information we collect from customers is collated and stored digitally on our bespoke applications hosted at our head office in Borehamwood. Data is protected at rest and in transit by industry standard encryption methods. Data is not transferred outside of the UK unless the Data Controller has provided permission.

8 Why do MDG collect your data?

The Data Controller has requested we collect your medical history in order that they can process your claim, manage your wellbeing or underwrite your insurance policy.

9 Customer Consent Verification

Before MDG can commence its process to collect personal and medical information, the Data Controller must have received consent to proceed. When we are in contact with the customer directly (via an employed or contacted medical professional) MDG will validate the customer's identity and consent, by asking the customer to confirm they are happy for us to collect their personal information.

If we are asked to collect the customer's medical history by requesting a report directly from the individuals own GP, MDG will rely on the consent provided to the insurer, employer or claims management company. This is often referred to as an AMRA, the Access to Medical Records Act 1988.

A customer may withdraw consent at any time. This can be done by expressing this decision directly to the MDG staff member or medical expert, or by contacting the Data Controller.

10 Where does your information go?

MDG are in most circumstances the Data Processor and not the Data Controller, this means we do not store or retain your information longer than necessary for the purposes of what we do. When we have collected all the data requested by the Data Controller this will be transmitted digitally to the Data Controller. We do not share your information with any third party that hasn't been approved by the client.

11 How long do we hold data?

MDG will ensure compliance with GDPR in respect of data retention. We will only keep your data for as long as is needed to fulfil our duties. MDG have a Data Retention and Destruction Policy which sets out specifically how long customer data will be retained. Unless required to by law, customer data will be anonymised 6 months after it is reported back to the Data Controller using automated database

Data Classification – Public

processes. Anonymised data is retained by MDG for management information reporting purposes and trend analysis.

12 Expressing your Rights

12.1 Complaints

Should anyone wish to raise a concern or provide feedback to us on their experience of MDG then we want to hear it. Complaints can be raised by calling our head office number on 0800 9800 633 and asking to speak to one of our Team Leaders or Managers. Customers can write to us at the address set out in section 6 or can discuss issues with the Data Controller.

12.2 Subject Access Requests

To make a Subject Access Request (see section 5) then write to us at our head office making your communication for the attention of Karen Forbes-Jackson, Resources Director or email us at enquiries@medicalsdirectgroup.co.uk. MDG's Data Subject Access Procedure is available on request or from our website: <https://www.medicalsdirectgroup.co.uk/>

12.3 Right to be Forgotten

To express your right to be forgotten contact us directly or through your Data Controller and will be erase all Personal Identifiable Data from our systems with 48 working hours of receiving a request.

12.4 Corrections/Errors or Missing information

If a customer has a concern that we have captured/recorded inaccurate information or failed to collect all the information we should have, customers can contact us directly or through the Data Controller and ask us to update our systems.

We will investigate the data held and confirm what information has been updated as a result of your request within 7 working days.

12.5 Escalating your concerns

If you have raised a concern with us and you consider we have failed to address the matter or respond to you appropriately you may escalate your concern to the Resources Director, a member of our Board or, should you feel the matter needs to be brought to the attention of the Information Commissioners Office then they can be contacted at <https://ico.org.uk/>.

13 Support & Further Guidance

This document is part of a range of policies and procedures that ensure the safe and secure processing of information. Further information is available on our website or by contacting head office in Borehamwood.