



# MDG

## Privacy Notice

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# 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
1.4	21/04/2021	SKP	Mark Tate	Annual update and improvements around adding information on records where we are Data Controller
1.41	27/01/2022	SKP	SKP	Annual review

# 2 Document Overview

<b>Data Classification</b>	Public
<b>Client Access</b>	Yes
<b>Purpose</b>	To comply with the General Data Protection Regulation and to help ensure we keep data safe
<b>Audience</b>	MDG Team
<b>Author(s)</b>	Karen Forbes-Jackson & Mark Tate
<b>Current Owner</b>	Sarah Preston
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<b>Next Review Due</b>	27/01/2023

# 3 Document Approval

Title/Role	Name	Signature	Date
MDG Board	Gavin Sampson		02/03/2020
Operations Director	Sarah Preston		21/04/2021

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## 4 Introduction

MDG has a legal and ethical duty to ensure we protect the information we collect and process on behalf of our clients and customers. To do this we have developed and maintain a range of policies and procedures which support the process of collection, storage and transfer information in a safe and secure manner. Within this Privacy Notice we aim to make clear to clients and 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 Sarah Preston, Operations Director on [spreston@medicalsdirectgroup.co.uk](mailto:spreston@medicalsdirectgroup.co.uk) or by calling 07592 540466.

## 5 The Individual's Rights Explained

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

- Provide them with a copy of their personal information. This allows them to see how and why we are using their information and that we are doing so lawfully. This is commonly known as a Subject Access Request (SAR)
- Correct their personal information if they think it is wrong or incomplete. We will take reasonable steps to check and correct any information we hold
- To erase any personal information and prevent processing in specific circumstances, often referred to as the "Right to be Forgotten". In this instance we can erase all data that we can leaving behind any that we must keep ourselves for legal reasons such as medical records generated by ourselves or financial data
- To 'block' or suppress the processing of personal data in specific circumstances
- To provide them with their personal data in a format which can be used across different IT environments, in specific circumstances
- To accept their objection to their personal data being processed and comply unless we are being asked to do this for legal reasons.

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

The individual also has rights in relation to automated decision making, including profiling. We do not use automated decision making in relation to the collection of any information in support of a claim or policy.

## 6 Who Is MDG?

MDG and Medicals Direct Group are trading names for Medicals Direct Screenings Ltd and Medicals Direct Screening Services Ltd  
Premiere House, 5<sup>th</sup> Floor  
Elstree Way  
Borehamwood  
Hertfordshire  
WD6 1JH

Company Numbers 02706045 and 11265465 respectively

Data Protection Lead – Sarah Preston

MDG is wholly owned by the Kuro Health Group.

## 7 What Does MDG Do?

MDG collects 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 in the majority of cases they handle. Data we will normally collect can include:

- Personal data, for example, name, address, date of birth & gender
- 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 clinical professionals with whom we contract, via our customers' own GPs and contracted UK and Irish laboratories, who will analyse any blood, urine or saliva samples taken for testing.

In a minority of cases we handle such as case management cases and therapy cases we must make records of the clinical interventions we make or organise. These records form medical records and for them MDG is the Data Controller directly. As medical records they contain personal sensitive information and are treated with the utmost of security accordingly.

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 Does MDG Collect Data?

The Data Controller or client has requested we collect customers' medical history in order that they can process a claim, manage their policy holders' or employees' wellbeing or underwrite an insurance policy. For the therapy and case management intervention we undertake it is a legal requirement that we make record of any actions we take.

## 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 (for case management and therapy cases MDG will collect consent directly as well). 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 or make intervention as required.

If we are asked to collect a customer's medical history by requesting a report directly from the individual's own GP, MDG will rely on the consent provided to the insurer, employer or claims management company to make this request. This is often referred to as an AMRA consent and takes its name from 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 the Information Go?

MDG is 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 and for our own financial audit purposes. 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 any information with any third party that hasn't been approved by the client or the individual directly in the case of records we maintain as Data Controller.

## 11 How Long Do We Hold Data For?

MDG will ensure compliance with GDPR in respect of data retention. We will only keep data for as long as is needed to fulfil our duties. MDG has a Data Retention and Destruction Policy which sets out specifically how long data will be retained. Unless required to by law, customer data will be anonymised using automated database processes before it is eventually destroyed as per MDG's data retention rules.

## 12 Expressing 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 as well.

### 12.2 Subject Access Requests

To make a Subject Access Request (see section 5) please write to us at our head office making the communication for the attention of Sarah Preston, Operations Director or email us at [enquiries@medicalsdirectgroup.co.uk](mailto:enquiries@medicalsdirectgroup.co.uk). MDG's Data Subject Access Procedure is available on request or from our website: <https://www.medicalsdirectgroup.co.uk/>

Please note we are only able to comply with SARs relating to data for which MDG is the Data Controller.

## 12.3 Right To Be Forgotten

To express a right to be forgotten contact us directly or through the Data Controller and we will erase any data that we can from our systems with 48 working hours of receiving a request. There may be data such as medical records created by MDG or financial data that we cannot erase.

## 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 the request within 7 working days.

## 12.5 Escalating Concerns

If anybody has raised a concern with us and they consider we have failed to address the matter or responded appropriately they may escalate the concern to the Operations Director, a member of our Board or, should they 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 And 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.