

PRIVACY POLICY

ASM-POL-PP01

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ASE Medical Ltd privacy notice

Including CCTV statement

This privacy notice tells you what you can expect us to do with your personal information, including how we store, process and destroy that information.

Contact details

Email:

admin@asemedical.co.uk

Address:

40 Caversham Road

Reading

RG1 7EB

What information we collect, use, and why

We collect or use the following information to provide services and goods, including service delivery:

- Names and contact details
- Addresses
- Date of birth
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Health information (including dietary requirements, allergies and health conditions)
- Health and safety information
- Account information
- Website user information (including user journeys and cookie tracking)
- Photographs or video recordings
- Call recordings
- Records of meetings and decisions
- Identification documents
- Information relating to compliments or complaints

In addition, we also collect the following information to ensure our service is tailored to meet our client's expectations and the demands of the service(s) we provide:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sex life information
- Sexual orientation information

This information is extremely important to us as a healthcare provider because it helps us understand the individual needs and requirements of our clients and patients, and ensures that we are accessible to all clients, regardless of any protected characteristic, and that we are doing all we can to ensure we reduce and remove boundaries to minority groups who may wish to access our services.

We collect or use the following information for the operation of client accounts and guarantees, service updates and marketing purposes:

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences
- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sex life information
- Sexual orientation information

The above-mentioned information will only ever be retained for use internally and will never be sold, shared or otherwise processed without your prior consent and knowledge.

We collect or use the following information to prevent crime, prosecute offenders, or defend against legal action:

- Names and contact information
- Client accounts and records
- Video and CCTV recordings of public areas (including indoor and outdoor spaces)
- Audio recordings of public areas (including indoor and outdoor spaces)
- Video and CCTV recordings of private or staff-only areas
- Audio recordings of private or staff-only areas
- Dashcam footage – inside & outside vehicle – with & without audio
- Body-worn video footage – with & without audio
- Call recordings
- Financial transaction information
- Information relating to health and safety
- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sex life information
- Sexual orientation information

The retention and use of this information is strictly for the protection and safety of our service users and staff. This information is retained on secure servers, in line with GDPR legislation, and is only released (where necessary) upon the request of an investigating police/health authority, or the service user themselves.

The above information may also be retained to comply with legal requirements.

We collect or use the following information for recruitment purposes:

- Contact details (e.g. name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID

- Employment history (e.g. job application, employment references or secondary employment)
 - Education history (e.g. qualifications)
 - Right-to-work information
 - Details of any criminal convictions (e.g. Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
 - Security clearance details (e.g. basic checks and higher security clearance)
 - Racial or ethnic origin
 - Religious or philosophical beliefs
 - Health information
 - Sexual orientation information
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Our lawful bases for collecting or using personal information to provide services and goods, operate client accounts and guarantees, prevent crime and prosecute offenders or defend against legal action, provide service updates or marketing, recruitment purposes and for legal requirements are:

- Consent
 - Contract
 - Legal obligation
 - Legitimate interest:
 - To provide a personalised care service, it is important that we obtain and maintain up-to-date clinical information regarding a client's health, well-being, clinical diagnoses and ongoing treatment plans and medications. This ensures that our clinicians have the right information to hand when attending to a client, without unnecessarily lengthy history taking, which might interfere with clinical assessment and intervention timeliness.
 - Vital interests
 - Public tasks and safety
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We obtain personal information by

- People directly
 - CCTV footage, or other recorded images
 - Debt collection agencies
 - Health care providers
 - Insurance companies
 - Legal and judicial sector organisations
 - Schools, colleges, universities or other education organisations
 - Councils and other public sector organisations
 - Publicly available sources
 - Previous employers
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How long we keep information

ASE Medical Ltd seeks to ensure that it retains only the necessary data to effectively conduct its business functions and work in the interest of its clients.

The need to retain data varies widely with the type of data and the purpose for which it was collected. ASE Medical Ltd strives to ensure that data is only retained for the period necessary to fulfil the purpose for which it was collected and is fully destroyed when no longer required. ASE Medical Ltd's data retention schedule is consistently applied throughout the organisation.

All data will be stored for a maximum of 6 years in line with standard GDPR guidance, except where legal requirements dictate otherwise.

Data Destruction

Data destruction ensures that ASE Medical Ltd manages the data it controls and processes it efficiently and responsibly. When the retention period for the data as outlined above expires, ASE Medical Ltd will actively destroy the data covered by this schedule. If an individual operating on behalf of the organisation believes that there exists a legitimate business reason why certain data should not be destroyed at the end of a retention period, they must identify this data to their supervisor and provide information as to why the data should not be destroyed. Any exceptions to this data retention policy must be approved by ASE Medical Ltd's data protection officer in consultation with legal counsel. In rare circumstances, a litigation hold may be issued by legal counsel prohibiting the destruction of certain documents. A litigation hold remains in effect until released by legal counsel and prohibits the destruction of data subject to the hold.

Who we share information with

- Data processors
 - Patient/Clinical/Staff data management services
 - This data processor does the following activities for us: Management of client and staff personal data, including but not limited to HR Records, patient care records, patient historical data, payroll information, and CRM function.
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Others we share personal information with

- Insurance companies
- Health care providers
- Organisations we need to share information with for safeguarding reasons
- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Emergency services (where necessary)
- Publicly on our website, social media or other marketing and information media (where appropriate)

→ Previous/prospective employers

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your data.

Your right to rectification - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your data in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your data in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

How to complain

If you have any concerns about our use of your data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

CCTV Statement

ASE Medical Ltd believes that its employees, sub-contractors and service users have the right to feel safe when delivering or utilising our service(s). For this reason, ASE Medical Ltd retains the right at all times to operate high-definition CCTV recordings with or without audio recording. Locations where video recordings may be obtained include:

- The exterior of property owned, rented or leased by ASE Medical Ltd
- The interior of property owned, rented or leased by ASE Medical Ltd
- The exterior of vehicles owned, operated, rented or leased by ASE Medical Ltd
- The interior of vehicles owned, operated, rented or leased by ASE Medical Ltd
- Body-worn cameras

Privacy, dignity and discretion are at the heart of all we do. With this in mind, CCTV recordings which may involve disclosure of private/privileged information and/or feature revealing images of individuals/patients will be treated with the strictest of confidentiality and in a manner applicable to any medically sensitive information. This includes where CCTV footage on a staff-worn body camera, or the inside of an ASE Medical Ltd vehicle captures all or part of a patient examination.

This footage will only ever undergo review when there are significant legal, clinical, or criminal grounds to do so. This footage will be stored on secure servers, with high-level access control, and will only ever be reviewed by authorised, senior company figures who have legally justifiable grounds to do so. This footage will never be shared, broadcast, transferred or otherwise processed in any way other than as dictated by law for the purposes of investigation, management and resolution of complaints, clinical shortcomings or criminal/legal proceedings.