

Privacy Notice for Business Contacts

- As part of the running of our business, The Humberside Group of Local Medical Committees Ltd (Incorporating Hull & East Yorkshire LMC and North & North East Lincolnshire LMC and known as 'Humberside LMCs') collects and processes personal data relating to our business contacts. We are committed to being transparent about how we collect and use that data and to meeting all our data protection obligations.

What information do we collect?

- We obtain and use personal information from various different sources. These are summarised in the following table.

Type of information	Description	Source
Name and contact details	This is basic personal data about you at your place of work, and how to get in touch with you.	This information is usually provided directly by the relevant individuals; it could for example be given over the telephone, in an email, through our websites, or in person at an event.
Organisation-related details	This is information about your organisation and your role within it, such as your job title and who your colleagues are.	
Login credentials	This is information such as your username and password, which are recorded if you sign up to or use any of our web-based services (such as booking to attend one of our events via our online booking function provided via Fourteen Fish or to advertise a job on www.generalpracticejobs.org.uk).	This information is provided by you or may sometimes be generated by us (for example, if we reset a password for you).
Contact history	This is information about our dealings with you, such as what information we have sent you, records of our interactions with you (emails, phone calls and meetings) and what meetings, events or webinars you have attended. It also includes your behaviour in response to our interactions with you, such as whether	Sometimes this information is provided by you (for example, emails you have sent us). On other occasions, we produce these records ourselves e.g. in the form of notes and minutes.

	you have opened our emails, clicked on a link or watched a video.	
Device information	This is information about the device you are using to access our websites, such as the type of device, its operating system, browser, its IP address, and what cookies are on it.	We produce these records ourselves by monitoring your use of our websites.
Website usage	This is information about your use of our websites, such as what pages you have visited and what content you have downloaded.	

How do we store your data?

3. Data will be stored in a range of different places including paper records, our websites and on other IT systems (including email and cloud-based software).
4. We are based in the United Kingdom, and will access and use your information from here.
5. Where we use third party suppliers to provide us with services, data may be sent and processed outside of the UK. For example, our cloud-based task management and collaboration tool is currently provided by a company which is based in the United States. People in other countries may also need to access the data held within the tool for purposes such as technical support.
6. Where data we control is processed outside of the UK but within the European Economic Area (EEA), the use of the information in those locations is protected by the same European data protection standards that apply within the UK.
7. Where data we control is processed outside of the EEA, we will ensure that suitable safeguards are in place to protect the information sent overseas. This will include making sure that information is only sent to an organisation which is a member of a scheme which has been approved by the authorities as providing a suitable level of protection. One example is the “Privacy Shield” scheme that has been agreed between the European and US authorities.

Why do we process personal data?

8. **Relationship management** - We use personal data for relationship management purposes. Relationship management is the ongoing maintenance of our relationship with our constituents, partner organisations, suppliers and their representatives. This could include activities such as letting you know about work being undertaken by Humberside LMCs, liaising with you about matters relating to our core activities of representing and supporting general practice, dealing with your enquiries, inviting you to events and webinars, or asking you for your input on various issues.
9. **Providing information and services** – A key part of our role is to provide relevant information and guidance to practices and the staff they employ as well as to the wider healthcare community. We use your personal data to email you our newsletter, highlight specific issues relating to general practice and primary care, and to tell you about relevant events and training we are organising. If you sign up to one of our events we will also use

your contact details to provide information about it e.g. timings and venues and follow-up information such as sharing presentations given and providing CPD certificates.

We will not send you our newsletter or information about events and training being offered if you have told us that you do not want to hear from us in that way. Please note that if you ask us not to contact you for these purposes, you will still hear from us for other reasons – for example, as part of our ordinary relationship management activity or as part of our statutory and representative functions.

10. **Monitoring and improving our websites** - We use information such as how different people navigate around our websites, how long they spend on particular pages and whether they download any of our content in order to help customise and improve the user experience of our websites. It also allows us to tailor the website to match your interests and preferences better and helps us understand who has visited which pages to determine the most popular areas of the website.
11. **Legal and regulatory purposes** - We may use your personal data for legal and regulatory purposes. For example, this might include responding to complaints or enquiries from you or a regulator about how we have used your personal data.

What are our legal grounds for handling personal data?

12. **Legitimate interests** - The UK’s data protection law allows the use of your personal data where necessary for legitimate purposes provided that this isn’t outweighed by the impact it has on you. The law calls this the “legitimate interests” condition for processing personal data. The legitimate interests we are pursuing are:

Interest	Explanation
Maintaining and using our business relationships; understanding and keeping in touch with: <ul style="list-style-type: none"> • our partner organisations and their representatives • the organisations with which we have a legitimate relationship and their representatives e.g. NHS England, CCGs, Councils and other bodies relating to health and primary care • customers of any of our services e.g. attendees to our events or users of our jobs website • suppliers 	We have an interest in maintaining and making use of our relationship with you. For example, if you work for one of our local CCGs, we may need to contact you in connection with a matter that relates to general practice (in our capacity as the representative body for general practice). Or, if you work for one of our suppliers, we may need to contact you about a product that your employer supplies to us. We also have an interest in understanding what kinds of people use our products and services and how they use them.
Promoting the work of the LMC	We have an interest in promoting our organisation and services to our constituents (general practices and their employees) and to the wider healthcare community.
Helping people learn about information, products and services that might be of use to them	Our constituents (GPs), their practices and their employees as well as others working within the local healthcare landscape have an interest in learning about information, products and services that they might find useful.

Monitoring and securing our systems and data	Some of the ways we use personal data are justified by the need to ensure that our systems and the data we make available through the website are kept secure and only made available to the correct people.
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13. **Other grounds** - In some circumstances, we may have other grounds to process personal data. These are set out in the following table, along with examples of the circumstances in which they might apply.

Grounds	Examples
Consent	We may in some circumstances rely on your consent. In those circumstances you will specifically be asked whether you agree to us using your data in specified ways. You can withdraw the consent and ask us to delete your information at any time - please see 'Your Rights' below.
Necessary for performance of a contract or to take steps for entering into a contract	If you sign up to one of our products or services, it will often be necessary for us to use your details in order to provide that product or service.
Necessary in order to comply with a legal obligation	Regulators, government bodies and courts have powers to order us to provide information and, like any other organisation, we sometimes have to comply with their requests.

Who has access to your data?

14. Your information may be shared internally within The Humberside Group of Local Medical Committees Ltd and be accessed by any of our employees if the data is necessary for the performance of their roles.
15. **Service providers** - We may provide your information to third parties who help us use it for the purposes described above. For example:
- Our database of personal data may be hosted by third parties on our behalf
 - We may use a third party email broadcasting service in order to send you service emails or (if you have agreed to receive them) marketing emails e.g. Mail Chimp
 - We may use a service such as Survey Monkey to gather views about the LMC's services or to consult on specific issues
- These service providers will not be allowed to use your information for their own purposes or on behalf of other organisations, unless you agree otherwise.
16. **Regulators** - We may sometimes need to pass personal data to a regulator such as the Information Commissioner's Office.
17. **Sharing of anonymised data with third parties** - We may share anonymised information with other third parties, but only where the information cannot realistically be identified as relating to you.

How do we protect data?

18. We take the security of your data seriously. We have a Data Protection Policy in place to ensure that your data is not misused or disclosed and is not accessed except by our employees in the proper performance of their duties.

How long do we keep data?

19. We will not keep your personal data for longer than we need it.
20. This means that we will normally keep your personal data while you or your employer have an ongoing relationship with us.
21. You can request us to delete it earlier as explained in the 'Your Rights' section below.

Your rights

22. You have a number of different rights in relation to the personal data that we hold about you. These are:
 - **Access:** You have a right to find out what personal data we hold about you, and certain other information such as how we are using it.
 - **Withdrawal of consent:** When we rely on your consent to use your data, you have the right to withdraw that consent at any time. You can do this by contacting us, or (in the case of emails that are sent on the basis of consent) by clicking the "unsubscribe" link.
 - **Rectification:** If the information that we hold about you is inaccurate or out of date, you have a right to ask us to correct it.
 - **Objection to legitimate interests:** If you disagree with us relying on the legitimate interests grounds for using your personal data, you can object to us doing so. We will then reassess the extent to which we can continue to use the data in light of your particular circumstances. In the case of our newsletter or emails that are sent on the basis of legitimate interests, you can do this by clicking on the "unsubscribe" link.
 - **Erasure:** In certain circumstances you can ask us to delete your personal data from our systems. However, this usually won't apply to all of your data because we might have good reason for needing to keep some of it.
 - **Restriction:** In some circumstances you can ask us to restrict the ways in which we use your personal data.
 - **Portability:** You have the right to receive some limited kinds of information in a portable format.
23. If you would like to exercise any of these rights, have any concerns as to how your data is processed or would like further information on anything contained within this document, please contact the Chief Executive by any of the following means:

Email: simon.barrett4@nhs.net
Phone: 01482 655111
Post: The Humberside Group of Local Medical Committees Ltd, Albion House,
Albion Lane, Willerby, Hull, HU10 6TS
24. If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner's Office (ICO). Further information about reporting a concern can be found at: <https://ico.org.uk/concerns/>. The ICO can also be contacted:

By phone: 0303 123 1113

In writing: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow,
SK9 5AF

What if you do not provide personal data?

25. You are free to choose whether or not you give us your personal data. However, if you are signing up to one of our products or services we might not be able to provide you with that product or service if you do not give us the information we need in order to do so.