Gregor McIntosh Aviation Ltd (GMA) - Privacy Notice

(Issued: 23<sup>th</sup> August 2023. For review: 23 August 2024)

- 1. Who are we?
- 1.1 GMA is as an independent occupational health provider in the UK. We provide independent occupational health services in the form of the following activities:

Private consultations, physical examinations and referrals to other healthcare specialists as clinically indicated.

Regulatory screening procedures- this includes diagnostic tests and investigations including blood and urine tests.

- 1.2 The clinic staff and healthcare professionals who provide you with services maintain records about your health. These records help GMA to provide you with the best possible service.
- 2. Protecting your data and GDPR
- 2.1 Protecting data has always been a priority for GMA. However, with the General Data Protection Regulation (GDPR) coming into force on the 25 May 2018 we see this as an opportunity to reinforce our commitment to ongoing data protection management. We are improving our policies, processes and systems in line with the requirements of the GDPR as we continue to make data protection a priority.
- 3. GDPR: When is it coming in?
- 3.1 The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. The GDPR will be enforced in the UK on 25 May 2018.
- 3.2 GDPR is only a part of the overall data protection framework. The Government has already introduced a Data Protection Bill into Parliament. When the UK leaves the EU, the Bill will help ensure that the standards of the GDPR are enshrined in UK law, and it also extends data protection laws to areas which are not covered by the GDPR (such as law enforcement).
- 4. What we are doing to get ready for GDPR?
- 4.1 GMA handles personal data and we are committed to meeting the

requirements of GDPR. Steps that we have taken and are taking include:

Analysing and improving our internal systems and processes.

Improving our privacy information in line with the new requirements.

Training our staff on the new requirements and new internal procedures.

Reviewing and updating all of our contracts where required.

- 5. How do we collect information from you?
- 5.1 We collect information when you register as a new patient at GMA and we ask you to complete a registration form and answer some questions about your personal health. Once you see a doctor during your appointment, the doctor will create a medical record about your personal health.

- 6. What type of information do we collect from you?
- 6.1 The personal information we collect includes your name, date of birth, home address, email address and contact telephone number. If you have attended GMA for an appointment in the past, we will have a record of that previous contact.
- 6.2 The medical information our doctor collects is specifically about your personal health. This includes information about your past medical history, any current medicines you are taking. If you have any tests carried out such as blood tests, X-rays or scans, we will keep the tests results in your healthcare record. If you have been referred to a healthcare specialist elsewhere we will keep any correspondence from the specialist in your healthcare record.

## 7. How do we use your information?

- 7.1 GMA collects and holds personal information for the sole purpose of providing occupational health service to patients. Your personal information is used to identify you as a patient who has used the GMA independent healthcare service. GMA uses the UK Civil Aviation Authority (CAA) medical records system known as Cellma to upload your medical information and documents. The CAA is the data controller and GMA is the data processor.
- 7.2 Your credit or debit card information is used to allow GMA to receive payment for your appointment.
- 7.3 We use patients' healthcare records to audit and monitor the quality of the GMA service. For example, we may audit the records of pilots to see how we can raise standards. When we carry out any audits, we never use any information that could identify a patient such as a name, address, or date of birth.
- 8. Who has access to your information?
- 8.1 The processing of your personal information and medical information is accessed only by GMA staff. Every member of staff who works for GMA has a legal obligation to keep information about you confidential.
- 8.2 Your medical information may be shared with another healthcare specialist outside of GMA if our doctor feels that you would benefit from seeing a health specialist. Such healthcare specialists may be based within the National Health Service (NHS) or at an independent healthcare provider. However, this will only be done after our doctor has explained this to you and only if you give your consent to do so.
- 8.3 We ensure that all information we hold is kept confidential. However, we are obliged to disclose personal information if it is required by law, or it is justified in the public interest.
- 8.4 We do not sell or rent your personal information to any third parties outside of GMA. We do not share your information with any third parties for marketing purposes.
- 9. Consent and agreement

- 9.1 By agreeing to this privacy notice, you are giving GMA permission to process your personal data specifically for the purposes identified. You are able to withdraw your consent at any time. Please contact us if you wish to discuss this.
- 10. Access to your information and correction
- 10.1 You have the right to make a request to GMA for a copy of the information that we hold about you other than CAA medical records for which they are data controller (see 10.4 for CAA held data uploaded to Cellma). If you would like a copy of some or all of your personal information (other than CAA data) please ask us by writing, telephoning or emailing us at:

Gregor McIntosh Aviation Ltd

**Peterculter Medical Practice** 

**Coronation Road** 

Peterculter Aberdeen AB14 ORP

07739 687840

GregorMcIntoshAME@gmail.com

- 10.2 We want to make sure that your personal information is accurate and up to date and are very happy to remove or amend any information that you think is inaccurate.
- 10.3 If you would like a copy of the medical information we hold about you, we may need to ask you some additional questions about your reasons for requesting the information. Medical information is known as sensitive data under GDPR regulations.
- 10.4 You have a right to make a request to the CAA for copies of medical documents held by the CAA (Cellma medical records) as the CAA is the data controller for this information. CAA contact details:

Medical Department
UK Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

Information on contacting the CAA and how the CAA uses your information can be found here:

www. caa. co.uk/commercial-industry/pilot-licences/medical/cellma-medical-record-system/how-we-use-your-information/

- 11. Security
- 11.1 When you give us your personal information, we take steps to ensure that it is treated securely. Any information we hold about you in paper format is held securely in locked filing systems. Any information we hold about you in electronic format is held securely on our computer system.
- 12. Use of 'cookies'

- 12.1 The GMA Internet website at www.bookmedical.co.uk uses cookies. A 'cookie' is a small piece of data that is stored on your computer's hard drive by a website. They collect statistical data about your browsing actions and patterns but do not identify you as an individual.
- 12.2 The GMA website also uses cookies in its email communications to personalise the email and track whether the mail has been opened or read. This allows us to monitor and improve our email communications and website.
- 12.3 You may refuse the use of cookies by selecting the appropriate settings on the Internet browser of your computer; however please note that if you do this you may not be able to use the full functionality of the www.bookmedical.co.uk website.