

## **BALTIC MEDICAL CENTRE LTD. PERSONAL DATA PRIVACY POLICY**

**Baltic Medical Centre** Personal Data Privacy Policy (“**Policy**”) sets out how **Baltic Medical Centre Ltd.** registered and operating at 121 Meridian Place Canary Wharf London E14 9FE and 13 Minnie Baldock Street Canning Town E16 1YE (hereinafter, the **BMC**) processes Patient’s data, including:

- what Patient’s data is processed by the BMC;
- for what purposes and on what grounds the BMC processes the Patient’s data;
- to whom the Patient’s data may be transferred and where from the BMC may receive the Patient’s data;
- Patient’s data storage periods;
- Patient’s rights relating to the processing of his/her personal data by the BMC; and
- other aspects related to the processing of the Patient’s personal data.

The terms used in this Policy are in accordance within the terms used in the agreement that the Patient concluded with the BMC for the provision of healthcare services, as well as the definitions used in legislation, including UK GDPR and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - **GDPR**).

### **The BMC is the controller of the Patient’s personal data**

The BMC has an appointed Data Protection Officer: Ms Veranika Kulikouskaya , tel. 020 7515 2714, [veranika.kulikouskaya@northwayclinic.co.uk](mailto:veranika.kulikouskaya@northwayclinic.co.uk)

Any questions about this policy should be sent to the Data Protection Officer.

### **What Patient’s data will be processed by the BMC?**

#### Data provided by the Patient

The BMC will process the Patient’s personal data that the Patient will provide to the BMC, this may include the Patient’s:

- Name;
- Contact information including telephone number and address;
- Payment information;
- National Insurance number;
- Date of birth;
- Gender;
- Health information; and
- Next of kin information.

If you visit our premises or contact us by telephone, the BMC will automatically collect additional personal data including

- Your image (and that of persons accompanying you) as recorded on our CCTV system;
- Your voice and information you choose to provide in the course of a telephone conversation with the BMC, which could include details of any medical condition or symptoms.

#### Data collected from third parties

The BMC may also process the Patient's personal data which may be obtained from other third party sources. For example the BMC may collect information from other healthcare institutions, test laboratories, insurance or medical tourism companies the Patient has contracted with or from other companies of the BMC group, provided that the Patient has entered into a service agreement with the third party. This personal data may include:

- Name;
- Contact information including telephone number and address;
- [Payment information;]
- National Insurance number;
- Date of birth;
- Gender;
- Health information; and
- Next of kin information.

In order to execute the agreement with the Patient, as well as to provide services adequately, when the Patient is directed, in accordance with the conditions provided for in the agreement for the provision of personal health care services, to partners of the BMC – other health care institutions, the BMC may obtain the Patient's personal data that is necessary for the provision of or settlement for the provided services from the said institutions.

#### **For what purposes will the BMC process the Patient's personal data?**

The BMC will process the Patient's personal data in order to:

- conclude and execute an agreement with the Patient;
- provide healthcare services, including data transfer to laboratories, where it is necessary to carry out tests for the provision of services;
- implement the statutory duties of the BMC, including the provision of emergency medical assistance, contacting the Patients' GP, NHS or other healthcare providers;
- respond to the Patients' queries or complaints;
- carry out the duties and rights of the BMC in relation to the use of our regulators, like the Care Quality Commission (CQC);
- carry out the duties and rights of the BMC in relation to the use of the police and other third parties where reasonably necessary for the prevention or detection of crime;
- administer the Patients' feedback on provided services, respond to Patients' inquiries that they submit by phone or e-mail, also online;
- register the Patient with the BMC;

- contact the Patient when it is necessary for the provision of services/performance of the agreement (for example, to inform the Patient about the test results, the payment for services, etc.) and to send appointment reminders;
- contact the Patient for the provision of services covered by compulsory health insurance;
- carry out direct marketing when the Patient has given his/her explicit consent.

### **On what grounds will the BMC process the Patient's personal data?**

The BMC may process the Patient's personal data on the following lawful grounds:

- when the Patient has explicitly consented to the processing of his/her personal data;
- processing of data is necessary in order to protect the vital interests of the data subject (Patient);
- processing is necessary for the establishment, exercise or defence of legal claims;
- processing is necessary in order to provide health care services or to manage health care systems in accordance with applicable legislation, including for compliance monitoring and training purposes;
- when it is necessary for purposes of our legitimate interests in ensuring the safety of our clinic premises and occupants (this does not apply to Patient special category personal data).

The grounds for processing are laid down in Article 6 GDPR and Article 9 (for special category personal data, such as health) and also in the UK Data Protection Act 2018. If the Patient requires further information about the lawful basis for the BMC's processing activities it should contact the Data Protection Officer.

### **How will the BMC process the Patient's data through direct marketing?**

With the [explicit] consent of the Patient to use his/her data for direct marketing purposes, the BMC acquires an opportunity to get to know the Patient, tailor offers to the Patient's needs, and provide other benefits specially geared towards the Patient, such as personalized offers in newsletters, information on the latest services provided by the BMC and other relevant notifications, as well as to offer services and/or ask an opinion on services.

During marketing, the BMC processes the following personal data of the Patient: name, surname, age, gender, telephone number and e-mail address and category of treatment received.

The BMC also uses data profiling and distributes the Patient's data, such as age and gender, and provides the Patient with relevant, interesting and useful offers and other information based on such data of the Patient. The BMC performs profiling to provide the Patient only with relevant updates and notifications. The Patient will also receive general offers and information.

The BMC may send notifications to the Patient to his/her e-mail and by telephone.

If the Patient no longer wants his/her data to be used for provision of personal offers, the Patient may withdraw his/her consent to the BMC for direct marketing purposes at any time by opting out from marketing (or decline to give consent in the first place). In this case, the

BMC will no longer be able to provide personalised offers and information useful to the Patient.

### **To whom may the Patient's personal data be provided?**

The BMC may provide the Patient's personal data:

- taking into account legal requirements: others healthcare institutions, as well as state and local government institutions, budgetary entities;
- in order to perform the agreement with the Patient, as well as to provide services properly: test laboratories, insurance companies with which the Patient has signed agreements;
- the BMC may also engage certain processors to whom the Patient's personal data may be transferred. Such processors may include: entities providing data centre services, other BMC group companies, entities providing call centre services, entities providing and maintaining software, entities providing email or other information technology infrastructure services, entities providing marketing services or other service providers whose services are related to the storage of the Patient's personal data;
- in order to perform the agreement with the Patient as well as to provide services properly when the Patient is referred to partners of the BMC – other healthcare institutions, in accordance with the conditions provided for in the agreement for the provision of personal health care services. The BMC transfers the Patient's personal data that is necessary for the provision of services and which the BMC receives from the Patient during registration to these institutions.

### **Will the Patient's personal data be transferred to another country?**

In providing the services, the BMC may transfer Patient personal data to countries outside of the UK, including Patient's country of residence, if different. Where the BMC transfers Patient personal data outside the UK, European Union or EEA (i.e. countries that are members of the EU together with Norway, Iceland and Lichtenstein) the BMC shall ensure that all data is treated with the same security measures regardless of location, and in accordance with our standards, policies, regulatory and legal obligations. Please ask the Data Privacy Officer if you would like more information about our arrangements for data transfers.

### **How long will the BMC store the Patient's personal data?**

The BMC will keep Patient personal data for as long as is necessary for the purposes set out in this Policy and to fulfil its legal obligations. This is usually for 3 years following the end of the provision of services to the Patient, to meet legal and contractual obligations and, if necessary, to resolve any disputes.

The Patient's data may be stored longer in specific cases provided for by law, when a dispute or complaint is under examination, as well as when it is necessary for the technical functioning characteristics and security requirements of the BMC information system (for example, backup copies, etc.).

At the end of the storage period, the Patient's personal data will be deleted at or before the end of data retention period.

## **What rights does the Patient have?**

Taking into account the restrictions established by law and under the conditions established therein, the Patient may have the right to:

- request from the BMC access to the Patient's personal data;
- require from the BMC rectification of incorrect, inaccurate or incomplete data;
- require the erasure of personal data or restriction of its processing, where there are legal grounds for doing so;
- object to the processing of his or her personal data;
- apply to the administration of the BMC for transferring the Patient's personal data provided by the Patient himself to the BMC and processed in an electronic format to the Patient and/or other data controller.

When the Patient's data is processed in violation of legal requirements, the Patient has the right to lodge a complaint with the ICO – Information Commissioner's Office: <https://ico.org.uk/>.

When the Patient's personal data is processed with the consent of the Patient, the Patient always has the right to withdraw the given consent by filing a request to the BMC by contacts indicated by the BMC in this Personal Data Processing Policy.

## **Contact**

Questions, comments and requests regarding this Policy are welcomed and should be addressed to the Data Protection Officer at the address above.