

# PRIVACY NOTICE (TIER 4)

## Document Control

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## 1. Privacy notice

### 1.1 Who are we?

Dr Lucinda Homer, Dr Ken Dawson and Dr Ben Empson provide authorised regulatory medical assessment services for the UK Civil Aviation Authority and other EASA national Aviation Authorities.

Our Data Protection Officer can be contacted directly here:

- medflightservices@gmail.com
- 07711096950

The personal data we would like to collect from you is:

<b>Personal data type:</b>	<b>Source</b> (where Medflight services and Aeromedical Services Ltd obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Name, Email address and phone number	You
Residential and postal address	You and your regulator
Doctor's name and address	You and your regulator
Employer and employment details	You and your regulator
Photo ID document	You
IP address	Jelly software
Details of booked appointments	Jelly software
National Aviation Identifiers	You and your regulator
Specific sensitive health and medical data	You, your regulator and other specialist health professionals authorised by you

The personal data we collect will be used for the following purposes:

- To organize appointments for services you require
- To positively confirm your identity
- To request and receive payment from you for services provided by us
- To carry out medical assessment services contracted by you
- To access personal and health data held by your Regulator
- To provide your Regulator with your personal and health data
- To make regulatory and non-regulatory assessment decisions

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- To inform your Regulator of regulatory assessment decisions
- To refer you to your Regulator's Medical Advisor/s
- To obtain assessment advice, from third party Medical Specialists
- To refer you, at your request, to third party Medical Specialists
- To communicate with you, in relation to your contracted services
- To communicate with you, in relation to regulatory matters
- To communicate important changes in our business or services to you

Our legal basis for processing for the personal data:

- Consensual Processing- for Aeromedical & Regulatory Medical Assessments
- Contractual Obligations- to provide the services you request from us
- Legal Obligations- there may be legal obligations of regulatory nature

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To request and receive payment from you for services provided by us
- To take action to recover monies due from non-payment for services provided

The special categories of personal data concerned are:

- Health data

## 1.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Medflight Services/Aeromedical Services Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by updating your preferences in Jelly Software or contacting Dr Lucinda Homer in writing or by e mail: medflightservices@gmail.com

## 1.3 Disclosure

Medflight Services/Aeromedical Services Ltd will not pass on your personal data to third country Non EU parties.

## 1.4 Retention period

Medflight Services/Aeromedical Services Ltd will process personal data for up to seven years after the last contracted services provided to you; and will store the personal data for at least ten years after your death, leaving the European Union, or until the

data is requested by and returned back to the Data Controller concerning regulatory matters, e.g CAA, EASA.

## 1.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you. Requests must be made to the relevant Civil Aviation Authority.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Medflight Services/Aeromedical Services Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

## 1.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Medflight Services/Aeromedical Services Ltd, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Medflight Services/Aeromedical Services Ltd's data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>[Data Protection Officer (DPO) contact details</b>
Contact Name:	CAA Data Controller	Dr Lucinda Homer
Address line 1:	Aviation House	Viennal House

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Address line 2:	Gatwick Airport South	International Square, Birmingham International Park
Address line 3:	West Sussex	Starley Way
Address line 4:	RH6 0YR	Solihull, B37 7HB
Email:	external.response@caa.co.uk	medflightservices@gmail.com
Telephone:		07711096950

### 1.7 Privacy statement

Read more about how and why we use your data here *[provide a link to your privacy statement on the website]*.

## 2. Online privacy statement

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### How we use your information

This privacy notice tells you how we, Medflight Services/Aeromedical Services Ltd, will collect and use your personal data for appointment booking services, contact related to your medical.

### Why does Medflight Services/Aeromedical Services Ltd need to collect and store personal data?

In order for us to provide you regulated medical assessment services we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes we obtain consent at the time of registration for online booking.

### Will Medflight Services/Aeromedical Services Ltd share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to us in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

### How will Medflight Services/Aeromedical Services Ltd use the personal data it collects about me?

Medflight Services/Aeromedical Services Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Medflight Services/Aeromedical Services Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

### Under what circumstances will Medflight Services/Aeromedical Services Ltd contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

### Can I find out the personal data that the organisation holds about me?

Medflight Services/Aeromedical Services Ltd at your request, can confirm what information we hold about you and how it is processed. If Medflight Services/Aeromedical Services Ltd does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Medflight Services/Aeromedical Services Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.

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- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

#### What forms of ID will I need to provide in order to access this?

Medflight Services/Aeromedical Services Ltd accepts the following forms of ID when information on your personal data is requested: Passport, Photographic Driving licence, Birth Certificate.

#### Contact details of the Data Protection Officer / GDPR Owner:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact Name:	Dr Lucinda Homef
Address line 1:	Viennal House
Address line 2:	International Square
Address line 3:	Birmingham International Park
Address line 4:	Starley Way
Address line 5:	Solihull
Address line 6:	B37 7HB
Email:	mefflightservices@gmail.com
Telephone:	07711096950

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### ***Document Owner and Approval***

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff and is published on the practice websites.

Signature:

Dr L Homer

Date: 24/05/2019

### **Change History Record**

Issue	Description of Change	Approval	Date of Issue
1.2	Update to include Dr Ben Empson	Dr L Homer	24/05/2019