

SCHEDULE 1
ABOUT THE INFORMATION I COLLECT AND HOLD

In the table below I have set out the individual purposes for which I will process your personal information and the legal justification for doing so. In most instances, I am also required to identify an additional legal justification where I am processing special categories of personal information (eg. medical information). Beside each legal justification, I have cited the relevant article of the EU General Data Protection Regulations (GDPR https://en.wikipedia.org/wiki/General_Data_Protection_Regulation).

Purpose for processing personal information	Description	Legal justification for processing personal information	Additional legal justification for processing special categories of personal information
To perform screening and regulatory checks on individuals before they become my patients.	I perform background checks in order to ensure that you are eligible to become my patient.	To take steps prior to entering into a contract with me for the provision of healthcare services (Article 6(b)).	Processing is necessary for reasons of substantial public interest (Art 9 (2) (g)).
To provide you with healthcare services.	As a healthcare provider I need your personal information in order to deliver that service.	To fulfil my contract with you for the delivery of healthcare services (Article 6(b)).	Processing is necessary to protect your vital interests where you are physically or legally incapable of giving consent (Article 9 (2) (c)).
To carry out local clinical audits.	I may process your personal data as part of local clinical audits. These audits assess outcomes for patients and are used to identify improvements I can make to patient care. This has an indirect	I have a business need, or 'legitimate interest' to process your personal information and such business need does not cause harm to you (Article 6(f)).	Processing is necessary for statistical and scientific purposes in the public interest (Article 9 (2) (j)).

	<p>benefit to the population as a whole.</p> <p>You can object to me using your personal data for this purpose at any time. If you would like to raise an objection please contact me as above.</p>		
<p>For national clinical audits. [DELETE AS APPROPRIATE]</p>	<p>I regularly share information with the National Clinical Audit programme and other quality improvement programmes. A list of these programmes can be found at http://www.hqip.org.uk/a-z-of-nca/</p> <p>When a programme has received statutory approval, I will not require your consent for inclusion. If a programme has not received statutory approval, you will be asked to consent before your information is processed.</p> <p>You can object to me using your personal data for this purpose at any time. If you would like to raise an objection please contact me as above.</p>	<p>I have a business need, or 'legitimate interest' to process your personal information and such business need does not cause harm to you (Article 6(f)).</p>	<p>Processing is necessary for statistical and scientific purposes in the public interest (Article 9 (2)(j)).</p>

<p>For medical research.</p>	<p>I participate in medical research programmes and share patient data with ethically approved third party organisations.</p> <p>Some research programmes have received statutory approvals such that consent may not be required to process patient information. When consent is required, then either the research organisation or I will contact you before your information is processed in this way.</p>	<p>I have a business need, or 'legitimate interest' to contribute to medical research and such business need does not cause harm to you (Article 6(f)).</p>	<p>Processing is necessary for statistical and scientific purposes in the public interest (Article 9 (2)(j)).</p>
<p>The external monitoring of safety and quality.</p>	<p>The Competition and Markets Authority Private Healthcare Market Investigation Order 2014 established the Private Healthcare Information Network ("PHIN"), as an organisation who will monitor outcomes of patients who receive private treatment. I am required by law to provide PHIN with information related to your treatment, including your NHS number, the nature of your procedure, whether there were any complications such as infection or the need for admission to a NHS facility and also the feedback you</p>	<p>I will only share this information with PHIN if you have provided your consent for me to do so (Article 6(a)).</p>	<p>I will only share this information with PHIN if you have provided your consent for me to do so (Article 9 (2)(a)).</p>

	<p>provided as part of a national survey. PHIN will use your information in order to share it with the NHS, and track whether you have received any follow-up treatment.</p>		
<p>Resolving patient queries or complaints.</p>	<p>Occasionally patients may make enquiries or complaints about the service or treatment offered. In order to investigate and resolve these matters properly, I need to access your personal information.</p>	<p>I have a business need, or 'legitimate interest' to process your personal information and such business need does not cause harm to you (Article 6(f)).</p>	<p>The processing is necessary in order for us to establish, exercise or defend our legal rights (Article 9(2) (f)).</p>
<p>Communicating with other healthcare professionals about your treatment.</p>	<p>Other healthcare professionals may need to know about the treatment I have given you in order to provide you with appropriate care in the future.</p> <p>I will only share a summary of your care and treatment with your GP or physiotherapist if you consent to it on your patient registration form.</p> <p>Examples of third parties who may need access to your information can be found at Section 10.</p>	<p>I have a business need, or 'legitimate interest' to process your personal information and such business need does not cause harm to you (Article 6(f)).</p> <p>I will only share a summary of your care and treatment with your GP if you have provided your consent for me to do so (Article 6(a)).</p>	<p>The processing is necessary for reasons of substantial public interest in the area of public health (Article 9.2(i)).</p> <p>The use is necessary in order for me to establish, exercise or defend our legal rights (Article 9(2)(f)).</p> <p>We will only share a summary of your care and treatment with your GP or physiotherapist if you have provided your consent for me to do so (Article 9(2)(a)).</p>

<p>Sharing your personal information with your insurer.</p>	<p>To allow your insurer to cover the cost of your healthcare, I need to communicate with them about the treatment you receive from me.</p> <p>Additionally, your insurer may require access to your medical records in order to validate and approve your treatment. Your insurer may also audit me for the purpose of validating the accuracy of my charges and assessing and assuring the quality of services provided by me.</p> <p>Your personal information will only be shared for this purpose if you have provided your consent on the patient registration form.</p>	<p>To fulfil my contract with you for the delivery of healthcare services (Article 6(b)).</p> <p>I will only share your medical record with your insurer if you have provided your consent for me to do so (Article 6(a)).</p>	<p>I will only share your medical record with your insurer if you have provided your consent for us to do so (Article 9(2) (a)).</p>
<p>Complying with legal or regulatory obligations, and defending or exercising legal rights.</p>	<p>As an independent practitioner, I am subject to a wide range of legal and regulatory requirements. I may be required to provide personal information of patients under these requirements, in which case I will have a legal responsibility to do so. From time to time, I may also be the subject of legal actions or complaints. In order to fully investigate and</p>	<p>The processing is necessary in order for me to comply with our legal obligations (Article 6(c)).</p>	<p>The processing is necessary for establishing, exercising or defending legal claims (Article 9(2) (f)).</p>

	respond to those actions, it may be necessary to process your personal information.		
Improving the quality of care and service.	I strive to offer an outstanding experience to all my patients. I may sometimes ask patients to review treatment and services for the purpose of improving them or monitoring patient outcomes. It is for this reason that I might also record and review phone calls.	I will only contact you regarding patient surveys if you have provided your consent on the patient registration form (Article 6(a)). I have a business need, or 'legitimate interest' to record patient phone calls and such business need does not cause harm to the patient (Article 6(f)).	I will only contact you regarding patient surveys if you have provided your consent on the patient registration form (Article 9(2)(a)).
For account settlement purposes.	I need to ensure that your account and billing information is accurate and up-to-date.	To fulfil my contract with you for the delivery of healthcare services (Article 6(b)).	The processing is necessary in order for me to establish, exercise or defend my legal rights (Article 9(2)(f)).
Managing my business operations.	I need to maintain accounting records, analyse financial results and receive professional business advice.	I have a business need, or 'legitimate interest' to use your personal information and such business need does not cause harm to the patient (Article 6(f)).	No special category data will be processed under this purpose, so no additional legal justification applies.

In case of lack of consent to specific aspects related to data collection please send an email to the following address: info@giuseppesforza.com