

# Patient's Privacy Notice

## DT4-PPP1 - Patient Portal

The Patient Portal is provided by South Warwickshire NHS Foundation Trust (SWFT) and is subject to the overarching GDPR privacy notice for the organisation. This is available on the Trust website at <https://www.swft.nhs.uk/privacy-policy>

Parties involved with processing data are the Trust and the supplier as follows:

South Warwickshire Foundation Trust  
Lakin Road,  
Warwick,  
CV34 5BW

Zesty Ltd  
C/O Office Space In Town,  
20 St. Dunstan's Hill,  
London EC3R 8HL

### Our contact details

You can contact the Trust's Data Protection Officer, Support Services Building, Lakin Road, Warwick, CV34 5BW; or via email: [information.governance@swft.nhs.uk](mailto:information.governance@swft.nhs.uk)

### What type of information we have

SWFT's Patient Portal will process the following information:

- Name
- Address
- NHS number
- Phone number
- Appointment information
- Clinical letters
- Prescriptions
- Health records and results
- Family, carer's, and carer provider details
- Clinical system code

### How we get the information and why we have it

Most of the personal information we process is provided to us directly by you and is stored on the Trust's electronic patient record system. The Patient Portal processes this

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personal data to enable you to have access to your information from any device that has internet access, anytime and anywhere.

Access to the Patient Portal is voluntary. You can choose to register for access to your data or choose not to.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing your personal information through the portal are:

GDPR Article 6 (1):

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

The legal basis for sensitive personal data – health is:

GDPR Article 9(2):

- (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

Zesty Ltd (processor) is able to process the data on behalf of the Trust (controller) by virtue of a legally binding contract.

### What we do with the information

We use the information that you have given us to post your appointment information, clinical letters, prescriptions and health records and results. To do this, the Patient Portal uses your demographic data (name, address, date of birth, phone number) and NHS number. The mobile phone number you have given us is used to send a text (SMS) message inviting you to register on the portal, a text (SMS) message with a 5 digit code to complete the registration process and further text (SMS) messages when new information is posted on the portal. The text message will be from *My Care in Warwickshire Portal*.

SWFT may contact you via the My Care in Warwickshire Portal to complete forms and questionnaires that relate specifically to your condition or hospital visit. This will assist the Trust in providing your care and treatment, as well as deliver vital feedback in relation to the services that you receive.

The forms and questionnaires you may be asked to complete are quick and simple to answer, and will provide invaluable information to clinicians delivering ongoing patient care to yourself and others.

### How we store your information

Zesty's patient portal is a cloud-based solution.

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All database data that includes patient identifiable data (PID) is held on Redcentric servers – these are UK based and on the secure HSCN network.

Redcentric - Central House, Beckwith Knowle, Harrogate HG3 1UG

AWS - 60 Holburn Viaduct, Holborn London EC1A 2FD

Patient letters are encrypted (multiple methods) and stored with AWS (Amazon Web Services) in Ireland, (Dublin) based data centres. AWS databases contain no PID (patient identifiable data).

IMIconnect is a data sub-processor used by Zesty and is in the UK. Their address is 15 St John's Lane, London, EC1M 4BH. It is used to provide SMS services. Textlocal is the specific product that Zesty Enterprise uses for SMS messaging.

A daily CSV (comma separated values) file of all patients who wish to go paperless will be downloaded by the Trust and passed to Synertec, third party hybrid mail supplier, for letter suppression

Zesty adheres to the Records Management Code of Practice for Health and Social Care 2016 and as such has adopted Appendix 3 of the Code contains the [detailed retention schedules](#)

For the Clinical PCQs (patient completed questionnaire's) these will be kept for 30 years or until 8 years after the patient's death. As yet Zesty has not been asked to implement any non-clinical PCQs, but if asked to do so, would start with the premise they are ephemeral records with a maximum retention period of 2 years in line with the Records Management Code of Practice for Health and Social Care 2016.

### Your data protection rights

Under data protection law, you have rights including:

**Your right to be informed** – If you require further information please review the Patient Privacy details on the Trust website or contact the Information Governance team using the details below.

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request please contact us using the details above, or contact Information Governance Support Services Building, Lakin Road. Warwick, CV34 5BW or via email at [information.governance@swft.nhs.uk](mailto:information.governance@swft.nhs.uk).

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**How to complain**

If you are unhappy with the way in which your personal data has been processed, or if you would like to access your personal information you can contact the Trust's Data Protection Officer, Support Services Building, Lakin Road, Warwick, CV34 5BW; or via email: [information.governance@swft.nhs.uk](mailto:information.governance@swft.nhs.uk)

If this does not resolve your concerns you can contact the Information Commissioner's Office: [www.ico.org](http://www.ico.org)  
 0303 123 1113 (local rate), 01625 545 745 (National rate)  
 Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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