

# Privacy Notice: Imperial College Health Partners

## 1. Overview

We are Imperial College Health Partners Limited (“**ICHP**”), and this is our privacy notice to inform you how we process any personal data that we may collect about you. You can get in contact with us for general enquiries at [EA@imperialcollegehealthpartners.com](mailto:EA@imperialcollegehealthpartners.com).

We are one of 15 health innovation networks in the UK and the designated health innovation network for North West London. In this capacity, ICHP is part of the NHS family and acts as the innovation arm for the NHS. You can find more about the Health Innovation Network (HIN) in the following [link](#).

This Privacy Notice covers any personal data that ICHP (“we”, “us”, or “our”) process when you access our website, subsequent communication you make when going through our website including receiving marketing messages, and if you have gone through our recruitment process. Additionally, this Privacy Notice also covers any personal data that we may process as part of our main HIN functions when engaging with other businesses and carrying out NHS related work.

We take our responsibilities under both the UK GDPR and Data Protection Act 2018 very seriously. You can be assured that your information will be used appropriately and in a lawful manner and always in line with data protection legislation. We will store your data securely with appropriate safeguards in place to protect it against unauthorised or unlawful processing.

## 2. What personal data is being used?

We process different types of personal data in different circumstances. What we collect and how we use that data changes depending on each circumstance.

All personal data we collect will not be made available to any third parties save for purposes necessary in order to fulfil our contractual obligations, to you. Where information is shared, it will be done on strictly need-to-know basis and limited to what is necessary.

We have provided the different scenarios of how we collect your personal data below:

### Cookies

When accessing our website, cookies will be used to allow basic functionality. These cookies are strictly necessary, without them, the site cannot function. We also use analytical/marketing cookies, which we only collect if you consent to ICHP collecting these cookies when you first go on our webpage.

Please note that all analytical cookies are aggregated data and are therefore strictly anonymised. The optional cookies we collect are:

Cookie	Name	Purpose	Retention
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Google Analytics	_ga	This cookie allows google to distinguish one user from another	2 years
	_gid	This cookie stores information of how visitors use ICHP's website to help create analytics reports of how our website is doing. The data collected includes the source where the user came from, all of which is in an anonymous form.	2 years
	_gat	This cookie does not store any information, it is used to throttle request rate and limit the number of requests that are made to dodoubleclick.net	2 years

### Recruitment Process

If you apply for an employment position with us (either by responding to a job posting advertisement or sent generally to inquire if any positions are available) we may collect and process certain sets of data. These sets of data may be collected directly from you or from a third party such as a recruitment platform, such as LinkedIn, Indeed and NHS TRACK. The data we collect during the recruitment process may include:

- First name;
- Last name;
- Email address;
- Postal address;
- Telephone number;
- Any other personal data which is included within your CV and/or cover letter (such as nationality);
- Contact information of any individuals who will act as referees.

Any or all parts of this data may be viewed by members of our staff (such as members of our hiring committee) or any outside individuals contracted to assist in reviewing applications.

### Personal data collected for business purposes

There may be times where we will need to collect personal data to carry out a contract with another business. The personal data that may be collected for this purpose may include personal information about business contacts or other individuals provided by other businesses. This data could include emails, names, other contact information, or any other personal data which will be necessary for us to carry out a contract.

### Personal data collected for NHS related work

There may be times where we will need to collect personal data to carry out work with our NHS partners. The personal data that may be collected for this purpose may include personal information about NHS staff contacts or other individuals provided by NHS organisations. This data could include emails, name, other contact information, or any other personal data which will be necessary for us to carry out NHS related work.

We rarely collect personal data regarding NHS patients, however, where we do, we act strictly as a data processor on behalf of our NHS partners, who are the Data Controller and dictate the purpose and means of how that data is used by ICHP. Where possible, we collect pseudonymous or anonymous information. As we act as a data processor on behalf of our NHS partners, we do not dictate what personal data we process, which will change on a case-by-case basis.

### **Personal data collected for our newsletter**

If you consent to receive our newsletter, we collect the following personal data in order to provide the newsletter to you:

- First name;
- Last name;
- Email address.

### **3. How will your personal data be used?**

#### **Cookies**

Strictly necessary cookies will be used for purposes in order for our website to run effectively and for you (as the viewer) to be able to access the website.

Analytical collect information about how a viewer uses a website, such as which pages you visit, and which links a viewer clicked on. Analytical cookies track when a viewer visits a site for the first time, as well as when they are a return viewer to the site. These cookies also track how long a viewer spends on a site at a given time. These cookies also track what link a viewer clicked on to access the site, and what keywords (if any) were used to generate the search. However, none of this information can be used to identify a person. All analytical cookies are aggregate in nature and are therefore anonymous.

#### **Recruitment Process**

The personal data which we may collect from you, or a third-party will be used to carry out our recruitment process. This data may be shared with any outside individuals contracted to assist in reviewing applications.

#### **Personal data collected for business purposes**

Along with personal data collected through our website, we may also collect personal data by email, phone, or paper documents during our business operations. This personal data may come from you, from our business contacts or from others (about themselves or about other individuals) during our business operations.

We will use personal data which is collected from other businesses or from you for business operations in order to:

- Administer a contract which we have entered into with you;
- Understand our business needs along with improving our services;
- Provide you with information, including in response to queries regarding our programmes and/or services;
- Host discussion forums along with the other use(s) described in other sections of this privacy notice.

In entering a contract or business relationship with us, if you fail to provide certain information when requested, we may not be able to perform the contract which we have entered with you, or we may be prevented from complying with our legal obligations. We will notify you if this is the case at the time.

Through the course of our business operations, we may also be required to use your personal data to comply with certain laws, or other specific uses for which you have given your consent. In any case where you have given your consent, you will be provided with specific information about the nature of the processing at the time of the collection.

### Personal data collected for NHS related work

We may also collect personal data by email, phone, or paper documents through our NHS related work. This personal data may come from you or from NHS sources. The personal data which may be collected will be used to help us carry out work related to the NHS or other relevant third parties.

We may also share your personal data with the other members of the Health Innovation Network for the purposes of improving patient and population health outcomes by translating research into practice, developing and implementing integrated health care services, supporting knowledge exchange networks, sharing best practice and providing for rapid evaluation and early adoption of new innovations. The other members of the Health Innovation Network are:

- Health Innovation East Midlands
- Health Innovation East
- Health Innovation Manchester
- Health Innovation Network South London
- Health Innovation Kent Surrey Sussex
- Health Innovation North East and North Cumbria
- Health Innovation North West Coast
- Health Innovation Oxford & Thames Valley
- Health Innovation South West
- UCL Partners
- Health Innovation Wessex
- Health Innovation West Midlands
- Health Innovation West of England
- Health Innovation Yorkshire and Humber

Members of the Health Innovation Network are mandated to respect the security of your personal data and to treat it in accordance with the law and therefore all members of the Network have entered into an agreement to regulate any data sharing between themselves.

### Personal data collected for our newsletter

Personal data such as names and email addresses will be used to facilitate the communication of our newsletter to our subscribers. This personal data will be shared with our sub-processor, Mandrill/Mailchimp which is located in the United States of America. There are Standard Contractual Clauses between us and the sub-processor to facilitate this transfer under UK GDPR. You have the option to unsubscribe at any time.

## 4. What is our lawful basis for processing your personal data?

We rely on the following lawful basis to process your personal data under the General Data Protection Regulation:

- **Article 6(1)(a)** – Consent (Cookies, newsletter)
- **Article 6(1)(b)** – Performance of a contract (business purposes)
- **Article 6(1)(e)** – Public interest (NHS related work where ICHP are a data controller and not a data processor)
- **Article 6(1)(f)** – Legitimate Interests (recruitment process, personal data collected for business purposes, personal data collected for NHS related work)

As a health innovation network we rely on legitimate interests for the majority of our data processing. Any data we process using the legal basis of legitimate interests is used to help foster and spread research and innovation within the NHS through its connections with local authorities, charities, academic organisations, and medical industry professionals. The data we process in order to help us achieve this is minimised to only what is essential.

### 5. How long will we retain your personal data for?

Your personal data will be kept in line with our statutory and organisational retention schedules and any legal obligation placed on us to keep your records. We retain personal data for different amounts of time depending on its purpose.

Generally, we may retain your personal data collected for the following periods:

Type of data collected	Retention period
Cookies	2 years
Recruitment process	1 year after notifying unsuccessful candidates. Successful candidates' personnel records will be kept for 7 years after employment ceases
Personal data collected for business purposes	6 years after expiry/termination with business purpose
Personal data collected for NHS related work	6 years after expiry/termination with purpose
Personal data collected for our newsletter	Whenever consent is withdrawn or newsletter is no longer used for the purpose collected from

### 6. Who do we Share your personal data with?

We use third party suppliers to process data under contract to provide our services ("processor(s)"), and we share the absolute minimum personal information required as part of this process.

Third Party Organisation Name	Location of Third Party Data Storage Centre	Third Party Functions
Microsoft Limited	United Kingdom	Cloud Storage, Email Service Provider
Health Innovation Network and other health innovation networks	United Kingdom	Innovation services to NHS
North West London Integrated Care Board	United Kingdom	Data Controller for NHS patient data for which ICHP provide support services to
Google	Republic of Ireland (EU)	Google Analytics service for analytical cookies for website analytics
Mailchimp (The Rocket Science Group LLC)	The United States of America	Newsletter provider
UHY Hacker Young Group	United Kingdom	Payroll and accounting services.

We may also be required to share your personal information with law enforcement agencies, regulators, courts or other public authorities if we have to by law. Where we are required to do so by law, we will only share what is necessary.

### **Where data is transferred to a third country**

As part of our newsletter communications, we use a processor for the purpose of sending newsletter communications to individuals who have consented into receiving the newsletter.

The processor we use for this service is Mailchimp (The Rocket Science Group LLC), who are based in the United States of America. As such, the data will be transferred outside of the EEA. However, we do have in place Standard Contractual Clauses in place with our data processing agreement with Mailchimp. This allows us to lawfully transfer the required data to Mailchimp even though they operate outside of the EEA.

## **7. Your personal data Rights**

As a data subject, you have legal rights on how your data is used. Whilst we have described your rights here, you can find more information on your rights on the following [guidance link](#) by the ICO:

### **The right to object**

In certain circumstances, you have the right to object to the processing of your data. When we carry out any direct marketing, you have the absolute right to object to the processing of your personal data. The method of objection to such processing will appear in the subject of the direct marketing in question.

You also have the right to object to the processing of your data where we act as a data controller and processes personal data on for purpose of a public task or under legitimate interests.

### **The right to be informed**

As a data subject, you have the right to be informed about how your data is collected and used. This Privacy Notice serves as our transparency material for data subjects as to how your personal data is used, informing you of our uses.

This Privacy Notice aims to provide you with information in a concise, transparent, intelligible way which is easily accessible and uses a clear and plain language.

### **The right of access**

As a data subject, you have the right to access and receive a copy of the personal data we hold about you. You can make a subject access request to us for this information.

We will provide the information in an accessible, concise, and intelligible format, and it will be disclosed in a secure way.

We have processes to ensure that you will receive it without undue delay and within one month of receipt., with the exception of circumstances in which we can lawfully extend the time limit to respond to your request.

We have the right to refuse such a request where there is a relevant restriction, or where the request is manifestly unfounded or excessive.

### **The right of rectification**

As a data subject, you have the right to rectify inaccurate personal data which we hold on to you. You can make a request to us verbally or in writing if you believe that information we hold on you is inaccurate.

We have the right to refuse a request and we are aware of the information we need to provide to you.

We have processes to ensure the response to a request for rectification without undue delay and within one month of receipt. In certain circumstances, we can extend the time limit to respond to a request.

#### **The right of erasure**

In certain circumstances, as a data subject you have the right to request verbally or in writing that we erase the personal data we hold about you. You can only request the personal data is erased where: it is no longer necessary for the purposes we collected it, if you provided the information by consent and you withdraw your consent, we have processed the information unlawfully, the erasure is in line with a legal obligation.

#### **The right of restricting processing**

In certain circumstances, as a data subject you have the right to request verbally or in writing that we restrict the processing of your data for a period. You can only request the processing of personal data is restricted where: you are contesting the accuracy of the personal data and it is being verified; the data has been unlawfully processed; we no longer need the personal data but you require us to keep it in order to establish, exercise or defend a claim.

#### **The right of data portability**

As a data subject, you have the right of data portability, meaning you have the right to receive a copy of your personal data in a structured, commonly used and machine-readable format.

The right of portability only applies where we have collected this information via consent, or the performance of a contract and we are processing the data by automated means (i.e. not paper files). The right of data portability does not apply to any data we collected with legitimate interests as a lawful basis.

## **8. Getting in contact or making a Complaint**

### **Contacting ICHP**

Should you have any queries about the how your information is used then please contact our team.

**You can do so by post at:** Imperial College Health Partners, Spaces, 307 Euston Road, London NW1 3AD

**Or by email at:** [EA@imperialcollegehealthpartners.com](mailto:EA@imperialcollegehealthpartners.com)

If you still remain unhappy with the answers provided, after engaging the team above, you can make a complaint directly to our designated Data Protection Officer at: [dpo@Informationgovernanceservices.com](mailto:dpo@Informationgovernanceservices.com)

### **Contacting the Information Commissioner's Office (ICO)**

If you do have a complaint regarding how we have handled your data, we would always encourage you to contact us first so we can try and resolve your complaint. You always have the right to lodge a complaint to the ICO, the UK's data protection supervisory authority.

**You can do so by post at:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9, 5AF.

**By telephone:** 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

**By email at:** <https://ico.org.uk/global/contact-us/email/>

**Alternatively, you can report a concern on the ICO website:** <https://ico.org.uk/concerns/>