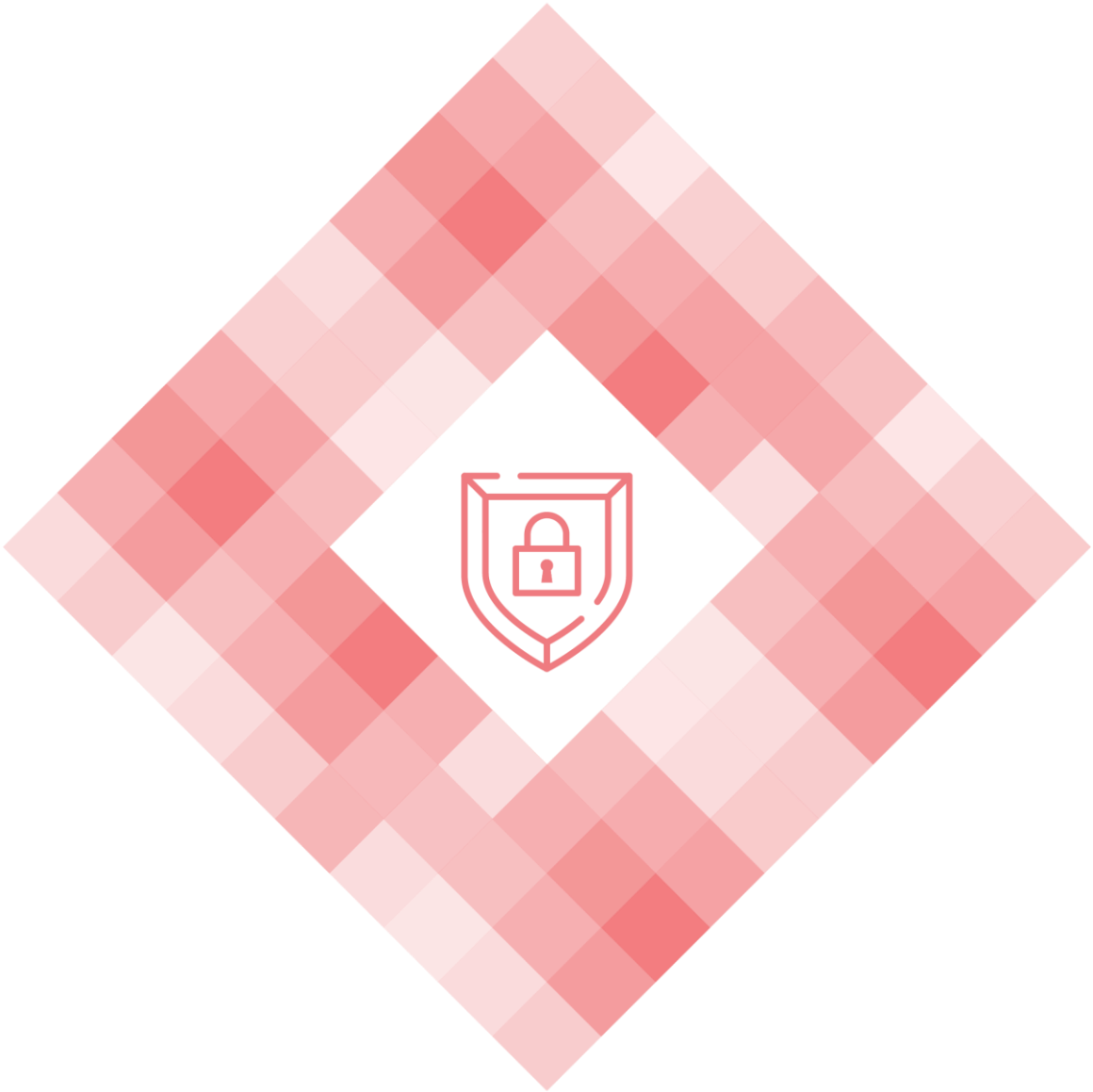
Isle of Man Government (Cabinet Office) – Health and Care Transformation Programme Privacy Notice – Pathfinders Project

September 2020



Gemserv

Welcome to the Isle of Man Health and Care Transformation Programme Privacy Notice, which is owned by the Cabinet Office. We recommend you take some time to read this notice and if you do not agree to this Privacy Notice please do not provide us with your personal data. The Cabinet Office is the controller and responsible for your personal data.

This Privacy Notice provides information on how we collect and process your personal data when you participate to an online survey, workshop, face-to-face or remote interview to help us collect feedback and improve how health and care is delivered across the island.

When we collect your personal data, we will:

- only collect what we need and no more
- keep your information secure
- tell you how we will use your information
- delete your information when it is no longer needed
- only process your information in line with rules set out in the Data Protection Act 2018

This privacy notice will explain:

- What information is collected and why
- Who is collecting it
- How it is collected
- Why it is being collected
- How it will be used
- How long it will be kept
- Who it will be shared with
- How that information will be kept secure
- International transfers
- Your rights, choices, including how to access and update information

If we decide to change our Privacy Policy we will post changes to this Privacy Notice. If you have any questions or comments on this Privacy Notice please email the Cabinet Office Data Protection Officer.

Contact the Data Protection Officer for the Cabinet Office:

Email: DPO-CabOff@gov.im

Phone: +44 1624 686779

Postal address: DPO, Cabinet Office, Government Office, Buck's Road, Douglas, IM1 3PN, Isle of Man, British Isles

How and why we ask you to share your personal data

We collect and process information, including personal data, to help us collect and collate feedback from service users and care professionals to improve the quality and design of health and care services across the island. We have designed our interviews, workshops and surveys to collect as little as personal identifiers as possible, and we will aggregate the information you have disclosed to us into reports that will remove all personal data.

We collect and process information, such as your contact details, for organisational purposes, to plan and schedule workshops, interviews and surveys.

We may also collect and process information that may be considered as sensitive, such as physical or mental health information, when you explicitly agreed to do so.

We use your personal data in line with the rules set out in the Data Protection Act 2018 for the following reasons:

- Where you have agreed to the collection
- To allow the Health and Care Transformation Programme to communicate with you, for organising interviews, surveys and workshops, or when you have requested to be contacted by our teams

Our legal basis for processing your information

We will only process your personal data if there is a legal reason for us to do so. We may rely on:

- Your consent – if we rely on your consent to process your information you may withdraw your consent at any time by contacting the Data Protection Officer
- The need to meet a request you have made to be contacted in relation to the Health and Care Transformation Programme, where applicable

When you decide to provide information that is considered as sensitive to us, such as physical or mental health information, we rely on your explicit consent to collect and process this information. This is purely voluntary and optional, and you will always have the choice not to disclose any sensitive information with us.

Types of personal data we collect about you

Depending on the Project, we may collect, use, store and transfer different kinds of personal data about you as follows:

Information you provide to us directly

Category of information	Examples of that type of information
Contact information	Name, email address, telephone number
Health information	Diagnosis, health history and past care received
Other information	Feedback, comments, complaints
Identification information	Name, title, profession, professional address

How long do we keep your personal data

We will only keep your information for the minimum time necessary. This may be to:

- To respond to an enquiry from you
- To collect and process the information you have provided us with in your feedback through online surveys, interviews and workshops

How we keep your personal data secure

The security and confidentiality of your information is very important to us.

We will ensure that:

- Safeguards are in place to make sure personal data is kept securely
- Only hold your information on servers that are under the control of the Cabinet Office and within the jurisdiction of the Isle of Man
- Only authorised staff are able to view your information
- Maintain security of the systems which hold personal data in line with ISO27001 standard
- We comply with the requirements of the PCI Security Standards Council

How we share your personal data

We may share your information:

- With or between other Government Departments, Boards and Offices to provide a service or information you have requested
- With our data processors, such as Microsoft and Survey Monkey, for collecting and processing your personal data

We will not sell to, or share, your personal data with other companies, organisations or individuals.

Your personal data will not be disclosed to any other third party without your prior consent or where required to do so by law. When we share your personal data with third parties, we will always ensure that appropriate contractual provisions are in place to protect your rights.

International transfers

We only store your information on servers that are under the control of the Cabinet Office and within the jurisdiction of the Isle of Man. When it is not possible for us to do so, for instance when we use a data processor who does not have servers in the Isle of Man, we ensure that your personal data is stored either within the United Kingdom or in the European Economic Area (EEA).

Your legal rights

To ask if we hold personal data about you

You can ask to see what information we hold about you by submitting a Subject Access Request to the Cabinet Office Data Protection Officer.

To request access to your personal data

Under the Data Protection Act 2018, you have a right of access to your personal data and to check the accuracy of that data by making a **Subject Access Request**.

A subject access request is made by contacting the Data Protection Officer (DPO) of the Department, Office or Board that collects the information.

To make a request of the DPO for the Cabinet Office contact:
DPO, Cabinet Office
Government Office
Buck's Road
Douglas
Isle of Man
IM1 3PN
Email: DPO-CabOff@gov.im
Phone: +44 1624 686779

In certain circumstances a charge may apply. We will respond to your request promptly and in any event within a maximum of 1 month, unless your request is complex or excessive. Depending on the circumstances,

we may either extend this period for further 2 months, or refuse to respond to your request. We will always inform you of the status of your request within 1 month of receipt.

To review your personal data and ensure it is accurate

Where possible we will provide you with access to the information we hold about you so that you can view this information and provide a means for you to have this information changed if it is not accurate.

Alternatively you can ask for the information we hold about you to be changed by making a request to the Cabinet Office Data Protection Officer.

To withdraw your consent

The participation to the Health and Care Transformation Programme is purely voluntary and we rely on your consent to process your personal data. If you decide to withdraw your consent and stop participating to the programme, please contact the Cabinet Office Data Protection Officer.

Please note that once the data is aggregated into reports, it will no longer be identifiable and withdrawing your consent will not affect the personal data lawfully collected.

To remove your personal data

You can request to remove your personal data about you. If you wish to exercise this right, please contact the Cabinet Office Data Protection Officer.

Please note that once the data is aggregated into reports, it will no longer be identifiable and requesting to remove your data will not affect data that has been already anonymised.

To make a complaint

If you are unhappy with the way we deal with your personal data you can submit a complaint to the Cabinet Office Data Protection Officer who will work with you to resolve any issues.

The Information Commissioner is the independent authority responsible for upholding the public's information rights and promoting and enforcing compliance with the Island's information rights legislation. Further information can be found on the Information Commissioner's website.

You have the right to request the Information Commissioner to undertake an assessment as to whether the processing of your personal data has been carried out in accordance with the provisions of the Data Protection Act 2018.

Contact details

To exercise any of your rights listed above, or for any query, please contact:

Data Protection Officer of the Cabinet Office

Email address: DPO-CabOff@gov.im

Telephone: +44 1624 686779

Postal address:

DPO, Cabinet Office

Government Office

Buck's Road

Douglas

Isle of Man

IM1 3PN

Will this privacy notice change

This Privacy Notice may change. We will not reduce your rights under this Privacy Notice without your consent. If any significant change is made to this Privacy Notice we will provide a prominent notice on this website so that you can review the updated Privacy Notice.

This privacy notice was last updated in September 2020.

To find out more please contact:

Operations

T: 020 7090 1001

E: operations@gemserv.com

W: www.gemserv.com

London Office:

8 Fenchurch Place

London

EC3M 4AJ

Company Reg. No: 4419878