1. Scope

This procedure applies in the event of an incident involving personal data that has happened within Dr Stephen Houston's AME practice at Malone Medical Chambers.

2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to collecting/processing of personal data.
- 2.2 All colleagues who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

 Dr Stephen Houston stephen.houston10284@gmail.com 07974269427

The personal data we hold about you is:

Personal data type:	Source
Contact details, such as your home address, telephone numbers, email	Directly from you or from
address etc. and contact details of others that you provide	third parties
Information about your physical or mental health, results of medical	Directly from you or from
examinations, eye tests, etc.	third parties
Other information which you voluntarily provide in the course of	Directly from you or from
employment that it is necessary to hold or use for the business purposes of	third parties
the AME or the Civil Aviation Authority	

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

• Completion of an aero-medical assessment.

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

- We share data with the UK Civil Aviation Authority (CAA). In these circumstances the CAA will be provided with personal data only in order to carry out its function as the regulator. We will take appropriate steps to safeguard your right to privacy and in addition the CAA itself is subject to data protection legislation.
- Reading of ECG data provided to our nominated cardiologist.

3.2 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 Stephen Houston to process 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 contacting Dr Stephen Houston (contact details (see 3.1 above))

Disclosure

The UK CAA and our nominated cardiologist will receive your personal data from Stephen Houston for the purpose of completing your aero-medical assessment.

3.3 Retention period

Stephen Houston will process personal data generally within 10 working days and will store the personal data for a minimum of 70 years after last application or last certificate issued for class 1 and 3 and 10 years after class 2.

3.4 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:

- <u>Right of access</u> you have the right to request a copy of the information that we hold about you.
- <u>Right of rectification</u> you have a right to correct data that we hold about you that is inaccurate or incomplete.
- <u>Right to be forgotten</u> in certain circumstances you can ask for the data we hold about you to be erased from our records.
- <u>Right to restriction of processing</u> where certain conditions apply to have a right to restrict the processing.
- <u>Right of portability</u> you have the right to have the data we hold about you transferred to another organisation.
- <u>Right to object</u> you have the right to object to certain types of processing such as direct marketing.
- <u>Right to object to automated processing, including profiling</u> you also have the right to be subject to the legal effects of automated processing or profiling.
- <u>Right to judicial review</u>: in the event that Stephen Houston 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 (as stated in 3.4 above) in the processing of your personal data.

3.5 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed within the practice, or how your complaint has been handled, you have the right to lodge a complaint directly with the Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

Contact Name: Dr Stephen Houston

stephen.houston10284@gmail.com

07974269427

4. 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 will collect and use your personal data.

Why does Dr Stephen Houston need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data in order to complete your medical assessment. 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.

Will Dr Stephen Houston share my personal data with anyone else?

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 Dr Stephen Houston use the personal data it collects about me?

We 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. We are 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 Stephen Houston 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?

Stephen Houston at your request, can confirm what information we hold about you and how it is processed. If we do not 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.
- The categories of personal data collected, stored and processed.
- 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?

We accept the following forms of ID when information on your personal data is requested: Passport, driving licence, security pass.

Contact details of the Data Protection Officer / GDPR Owner:

 Dr Stephen Houston <u>stephen.houston10284@gmail.com</u> 07974269427 Data Protection Officer / GDPR Owner

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.

Date:_

A current version of this document is available to members of staff at clinic reception.

Stephen Houston

11 April 2022

Signature:_____