**Privacy Policy**

Our Primary Care Network is committed to protecting and respecting your privacy. This policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

Our Commitment to Data Privacy

We are committed to protecting your privacy and will only process personal confidential data in accordance with the General Data Protection Act (GDPR).

Our Primary Care Network are the Data Controller under the terms of the General Data Protection Act. We are therefore legally responsible for ensuring that all personal information that we process i.e. hold, obtain, record, use or share about you, is done in compliance with GDPR.

Everyone working for our Primary Care Network has a legal duty to keep information about you confidential. All of our staff receive appropriate training to ensure they are aware of their personal responsibilities and have contractual obligations to uphold confidentiality, enforceable through disciplinary procedures.

Information we hold about you

Throughout your interactions with us we will only collect the data that we require in order to provide you with the service that you are requesting.

Information you give us – Primary Care Network Newsletter

We use the information you give us to:

* send you the publications, newsletters and updates that you have subscribed to
* provide you with the services and the information about our activities and events that you have requested
* administer any user accounts we set up for you
* conduct surveys and process your response to any survey you participate in for research, evaluation and statistical purposes
* analyse and improve the activities and content offered by our Primary Care Network website to provide you with the most user-friendly navigation experience.
* otherwise communicate with you regarding our aims and activities
* ensure we do not send unwanted information to those who have informed us they do not wish to be contacted
* keep a record of your relationship with us
* keep your data up to date
* use IP addresses to identify the location of users, to block disruptive use

Information we collect about you through our website

We may automatically collect the following information about your visit. This information will not identify you, it relates to:

‘Google Analytics’ collects technical information, including your browser type and version, time zone setting, operating system and platform and the pages you visit.

‘Cookies’ are stored whilst you are using this site. We use cookies to recognise your computer when you visit our website to improve the website’s usability. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org/).

Use of cookies on our website

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognise your browser. Cookies may store user preferences and other information.

Cookies provide a convenience feature to save you time, or tell the Web server that you have returned to a specific page. For example, if you personalise pages on our Website, or register for a Subscription Service, a cookie helps us to recall your specific information on subsequent visits. When you return to the same Website, the information you previously provided can be retrieved, so you can easily use the customised features.

Cookies set by the website owner (in this case, our Primary Care Network) are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. interactive content and analytics). The parties that set these third party cookies can recognise your computer both when it visits the website in question and also when it visits certain other websites.

We use first party and third party cookies for several reasons. Some cookies are required for technical reasons in order for our Website to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Website.

You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences by clicking on the appropriate opt-out links. You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

The specific types of first and third party cookies served through our Websites and the purposes they perform include:

• Strictly necessary cookies. Strictly necessary cookies allow core website functionality such as user login and account management. Because the website cannot be used properly without these cookies, you cannot refuse them. You can block or delete them by changing your browser settings however.

• Performance cookies. Performance cookies are used to see how visitors use the website, eg. analytics cookies. Those cookies cannot be used to directly identify a certain visitor.

• Functionality cookies. Functionality cookies are used to track use of enhanced content, eg. video content from YouTube.

You can change your consent to cookie usage using the Cookies Settings button at the bottom of the website. Click on Show Details for a detailed breakdown of all cookies used.

We may update our cookie policy from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Any updates relating to our use of cookies will be published on this web page.

How your information is used

Personal information will only be used for the purpose of which it was originally given by the individual.

Your information will never be used for marketing, research or profiling without your explicit consent.

Your Rights

You have certain legal rights, including a right to have your information processed fairly and lawfully and a right to access any personal confidential data we hold about you.

Right to be informed

You have the right to be informed about the collection and use of your data.

You also have the right to be notified of a data security breach concerning your personal data if it results in physical, material or non-material damage to you such as loss of control over your personal data, discrimination, identity theft or fraud, financial loss or loss of confidentiality of personal data.

Right of access

You have the right to access any of your personal data that is being processed together with supplementary information. If we do hold information about you we will:

* Give you a description of it;
* Tell you why we are holding it;
* Tell you who it could be disclosed to; and
* Let you have a copy of the information in a plain readable format.

There are no fees for making a request. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.

Right to be forgotten

You have the right to have your personal data erased. This right is not guaranteed and applies only in certain circumstances.

Right to restrict

You have the right to request the restriction of your personal data from being processed. This will restrict any ongoing processing but not erase any data we hold.

Right to rectification

You have the right to have inaccurate personal data rectified or completed if it is incomplete.

Right to object

You have the right to object to data processing of the information we hold about you, where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.

Rights in relation to automated decision making and profiling

We do not make any automated decisions or profiling with your personal data.

How to make a request

Requests must be made in writing to our Primary Care Network. Alternatively you can email us.

The information we will require when you make a request is your name, email address, contact telephone number, name or your practice or company and a description of the request.

We will respond within a reasonable period and no later than one calendar month.

Third Parties

We use a range of third-party data processors to assist us in connection with the services that we provide.

These organisations are subject to the same legal rules and conditions for keeping personal confidential data secure and are underpinned by a contract with us.

Technical service providers - We may share your details with providers we use to provide computing services.

Email software - We may share your details with e-mail software providers to allow us to send email newsletters to you.

Communication services - We may share your details with companies who provide us with communication services such as a customer support.

We do not sell your personal information to any third parties for any purposes.

Processing outside the UK

Third parties we may use may be situated outside the UK.

We will ensure that these companies are committed to ensuring such transfers are compliant with applicable data transfer laws, including GDPR.

Data Retention

Customers - We will retain the information we hold about you along with invoices for a minimum period of six years to enable us to comply with our legal obligations in respect of, for example, the HMRC.

Data Backups

Backup data is encrypted and stored off site.