

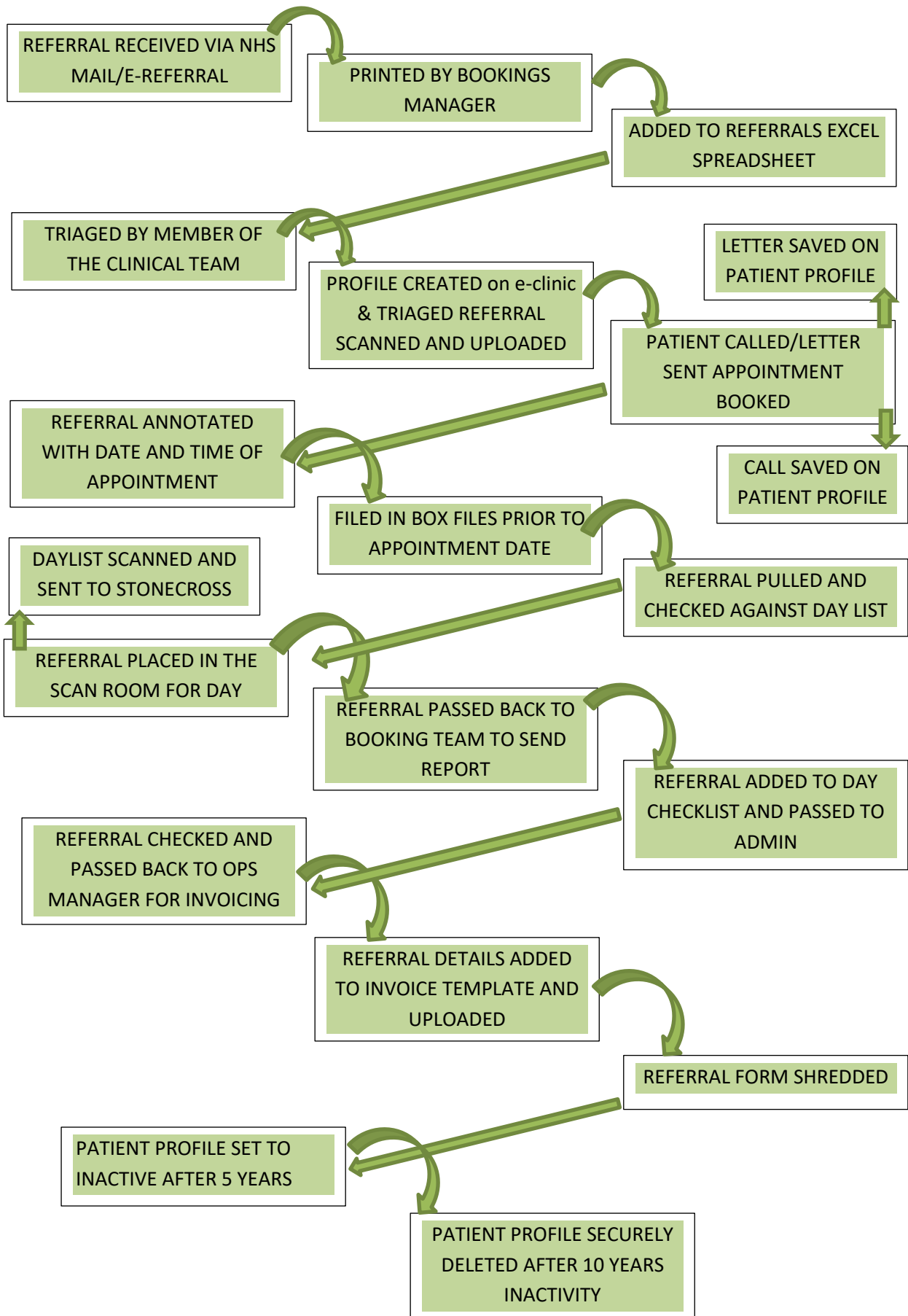


CONFIDENTIAL INFORMATION DATA FLOWS

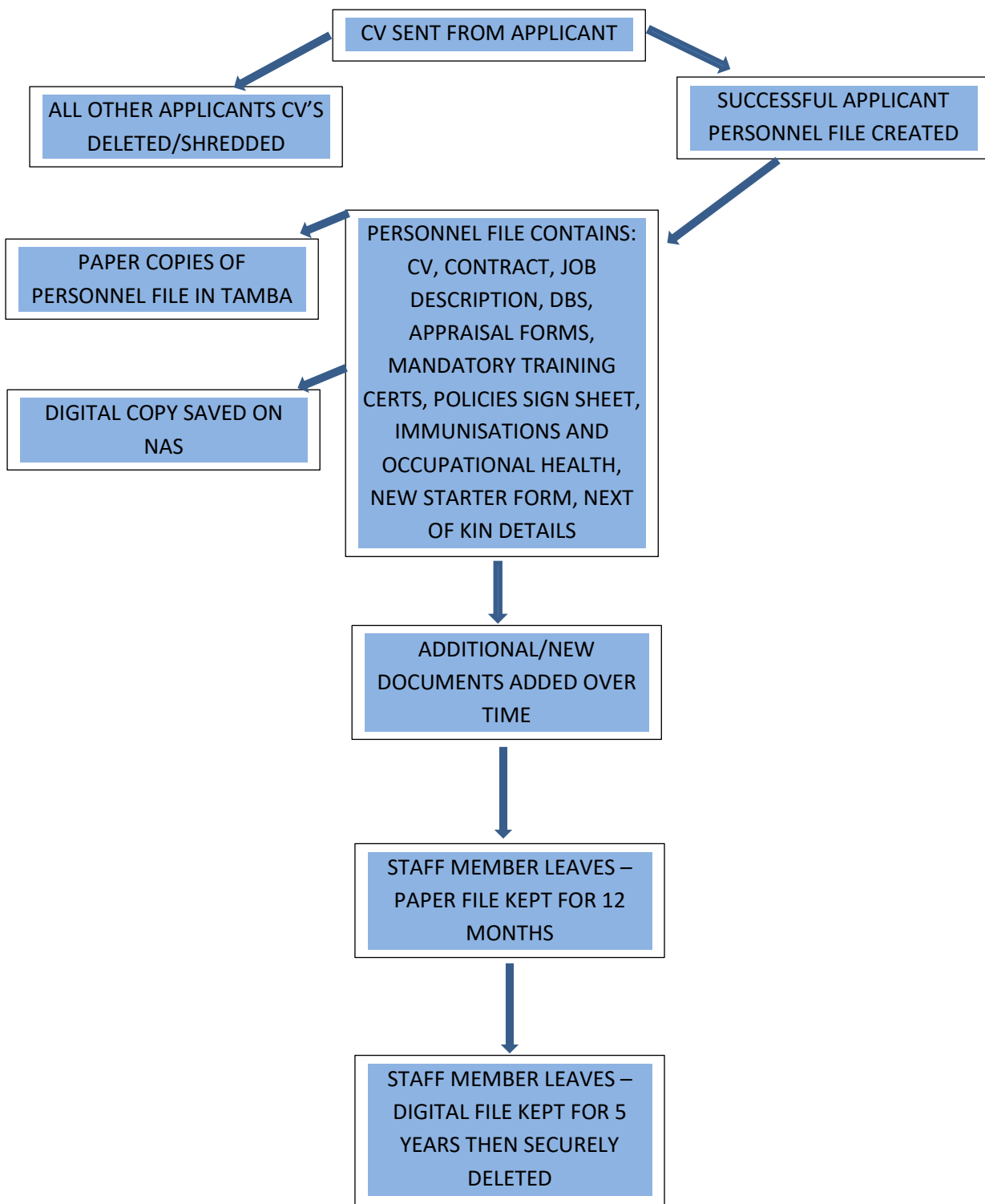
(Version 1)

AUTHOR	Date	AUTHORISER	Date
EMMA STREATER -SERVICE DIRECTOR/Data Protection Officer	27.03.2019	HEATHER MOORES – MANAGING DIRECTOR/SIRO	27/03/2019
Date of next review: 27/03/2020			

INFORMATION OF DATA SUBJECTS: PATIENTS

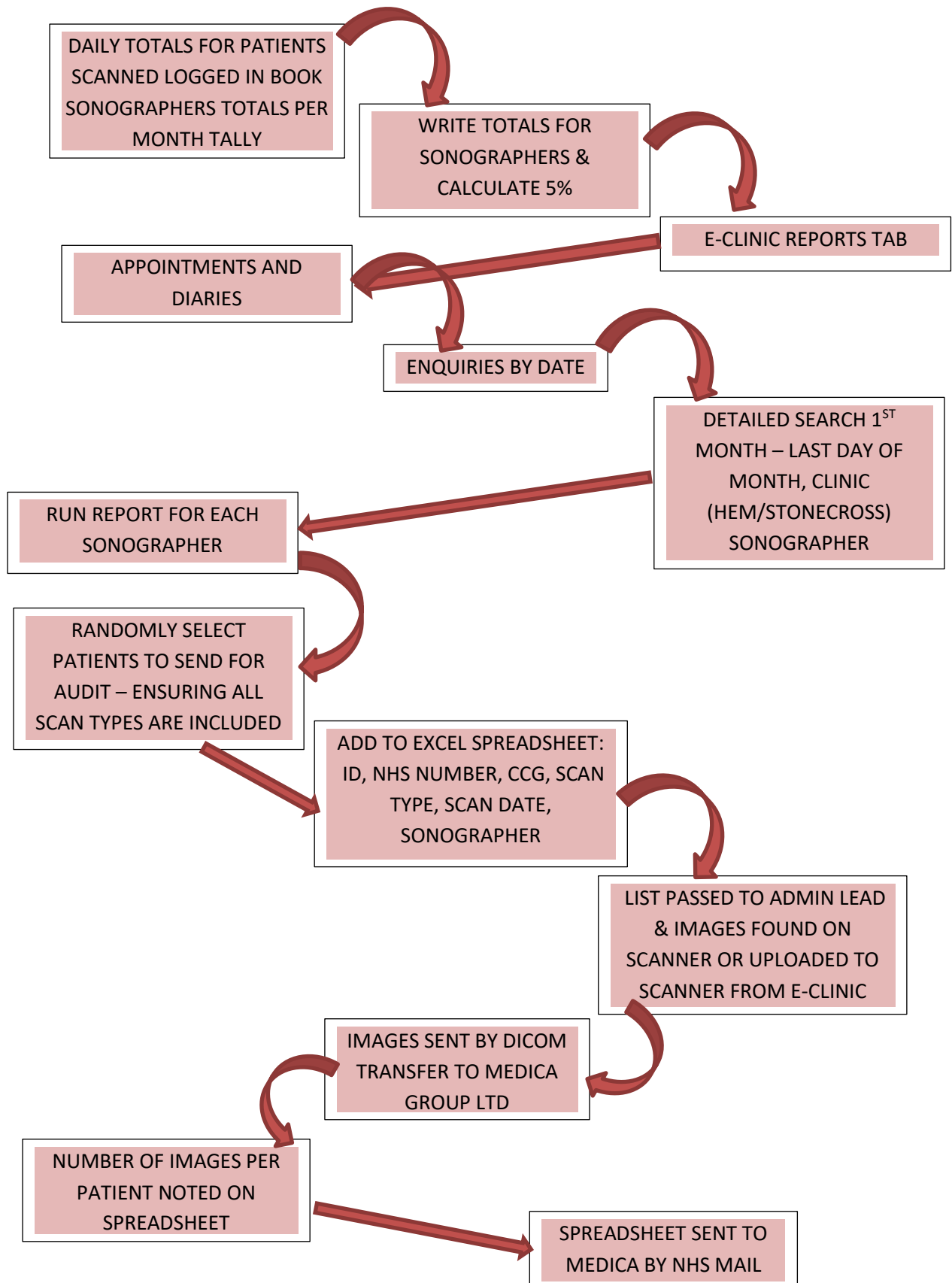


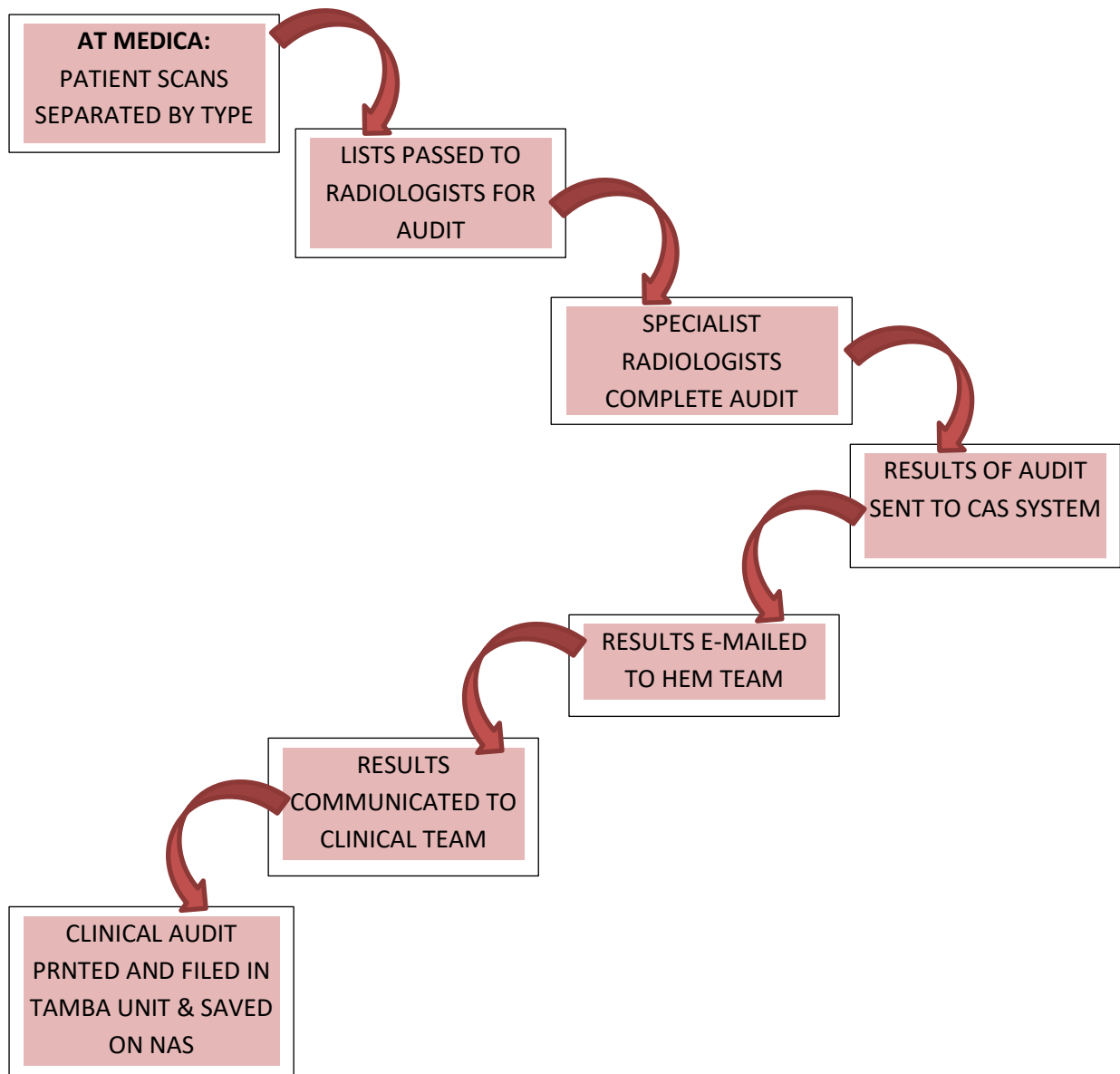
INFORMATION OF DATA SUBJECTS: STAFF



INFORMATION OF DATA SUBJECTS: PATIENT CLINICAL AUDIT

We undertake 5% clinical audits of all sonographers' scans at HEM. We do not discriminate and ensure scans selected to be sent for audit will be selected at random.





LEGAL BASIS FOR PROCESSING IN LINE WITH THE GDPR

As a company processing confidential data it is important we establish what our legal basis for processing. In line with the GDPR articles 6 and 9 we are able to determine our legal basis for processing confidential data:

GENERAL DATA PROTECTION REGULATIONS:

Article 6:

Lawfulness of processing

'(d) Processing is necessary in order to protect the vital interests of the data subject or of another natural person'

'(f) Processing is necessary for the purposes of legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject which require protection of personal data, in particular where the data subject is a child'

Article 9

Special Category Data:

'(h) processing is necessary for the purposes of preventative or occupational medicine, for the assessment of working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member state Law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3.'

We establish the lawful basis for processing is appropriate to our service. We do not process information for marketing purposes and we do not have any processes that include automated decision making.