

Privacy Notice

1. Introduction

Healthcare Partners Ltd is committed to protecting the privacy and personal data of patients, service users, and employees. This notice outlines how we collect, use, store, and protect personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Who We Are

Healthcare Partners Ltd is a limited company wholly owned by the Royal Surrey NHS Foundation Trust. We provide healthcare management and support services. We are not regulated by the Care Quality Commission (CQC). We act as a data controller or processor depending on our contractual obligations and relationships with NHS Trusts.

3. Whose Data We Collect

- Patients: individuals receiving services delivered or supported by us on behalf of NHS organisations
- Service users: NHS Trust clients, suppliers, contractors
- Employees: staff, contractors, agency workers, and job applicants

4. What Personal Data We Collect

- Patients: name, date of birth, NHS number, contact details, medical history, appointment records, treatment information, feedback, complaints
- Service users: name, contact details, job role, contract information, communications
- Employees: HR records, payroll, DBS checks, training records, leave/sickness records

5. How We Use It

- Administer contracts and service provision for NHS Trusts
- Manage employment relationships and HR functions
- Monitor service performance and respond to queries or complaints
- Ensure safety, compliance, and service quality

6. Legal Bases

- Performance of a contract
- Legal obligation
- Vital interests (for urgent patient care)

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- Public task (providing services on behalf of NHS bodies)
- Legitimate interests (for operational needs)
- Consent (where applicable, such as for marketing or surveys)

7. Sharing Your Data

We may share personal data with:

- NHS organisations and clinical staff involved in patient care
- Payroll providers and HR platforms (for employees)
- IT and data hosting providers
- Regulators, auditors, and legal authorities where legally required

All third parties are under data protection agreements.

8. Retention Periods

We retain data in accordance with the NHS Records Management Code of Practice, employment law, and our data retention policy. Patient data is retained only for as long as necessary to support care, meet legal obligations, or satisfy NHS Trust requirements.

9. Your Rights

You have the right to:

- Access your personal data
- Request correction or deletion of inaccurate data
- Restrict or object to processing
- Withdraw consent (if given)
- Request data portability (where applicable)
- Lodge a complaint with the Information Commissioner's Office (ICO)

10. Direct Marketing & Opt-Out

We do not send marketing to patients unless explicit consent has been provided. Any optional communications (e.g. feedback requests or newsletters) will include a clear option to opt out. You may withdraw consent at any time by contacting us.

We review our data processing on an annual basis to assess if the national data opt-out applies. This is recorded in our Record of Processing Activities. All new processing is assessed to see if the national data opt-out applies. If any data processing falls within scope of the National Data Opt-Out we use [MESH](#) to check if any of our service users have opted out of their data being used for this purpose.

At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. We review all of the confidential patient information

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we process on an annual basis to see if this is used for research and planning purposes. If it is, then individuals can decide to stop their information being shared for this purpose. You can find out more information at <https://www.nhs.uk/your-nhs-data-matters/>.

11. Contact Us

Data Protection Lead
Healthcare Partners Ltd
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Surrey Research Park
Guildford
Surrey
GU2 7AU

Email: rsch.hplquality@nhs.net

Phone: 01483 571122 Ext.3004

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