

PRIVACY NOTICE

SOUTHERN HEALTH & SOCIAL CARE TRUST (SHSCT) MOBILE COMMUNICATION APPLICATION – SHSCT Connect

Last Revision Date: 22 April 2020

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1. Introduction

This policy (“Privacy Notice”) forms part of our Terms of Service and governs how the Southern Health and Social Care Trust (“SHSCT”, “we”, “our” or “us”) use Personal Data (as defined below) that we collect, receive, use and store about individuals in connection with the use of our mobile application (“App”). **[SHSCT Connect]**

The privacy of our users is important to us and the proper handling of all personal data is considered of the utmost importance. As used in this document, “personal information” or “personal data” is expressed as having the same meaning as defined under Article 4 of the General Data Protection Regulations 2018 (“GDPR”):

“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.”

This policy sets out and explains our practices and the choices you can make about the way your Personal Data is collected and used in connection with the App. We strongly urge you to read this Privacy Notice in full and make sure that you fully understand and

agree with it before using the App. By using the App, you agree to the terms of this Privacy Notice and to our collection, processing and sharing of Personal Data for the purposes set forth herein. If you do not agree to particulars, please do not access or otherwise use the App. An explanation of the various rights you can exercise as a Data Subject (“user”), as well as how you can exercise those rights is outlined in section 5 of this policy.

For the purposes of this policy, the SHSCT is the data controller and operates the referenced mobile App.

Registered Address: 10 Moyallen Rd, Gilford, BT63 5JX

ICO Registration Ref: Z9793239

The App was developed for the purpose of providing an end-to-end communication platform for the SHSCT senior management team to engage and support staff and relay information relating to the Covid-19 pandemic and/or other SHSCT information. Staff will benefit from having access to a central trusted source of information without requiring access to a SHSCT network device.

The App is available for download to mobile devices from the Google Play and Apple Stores.

2. What Personal Data we collect and how we collect it

The SHSCT will receive, collect and use the data listed below as it is necessary to provide you the App and to support our legitimate interests in better understanding, securing and improving our App and overall performance.

We receive and collect Personal Data from your mobile device about your use of the App and make use of log files and analytics tools to analyse trends, administer the App, track users’ movement around the App, and gather statistical data. We use “cookies”, technical identifiers and other tracking technologies in order to provide and enhance our App and collect limited data regarding your system and device, such as your mobile device id or browser preferences. Fundamentally, these will be adopted with security and improved service experience in mind and will not be used to collate personal identifiable data.

Categories of data collected:

Usage Data

We collect data about how you are accessing and using the App, which include administrative and support communications with us and information about the features (“assets”), content, and links you interact with, and what third- party integrations you use (if any); Such information may include Personal Data.

Log Files

When you access the App through a mobile device (such as a smartphone or a tablet), we may collect certain limited data automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile internet browser you use, the questions put to the integrated Chatbot and other statistics such as time stamps of App use (“Log Data”). This data can be used to analyse trends, administer the App, track user movement in the App, to diagnose problems with the App and gather statistical data.

Cookies and Other Tracking Technologies

Our App utilises “cookies”, anonymous identifiers and other tracking technologies in order for us to improve user experience and help us gather aggregate, non-personal statistics. Note, while we may rely upon aggregate information to measure the users’ interest in, and use of, various areas of the App and may share this information with third-parties, none of the information will be personally identifiable.

Service Integrations

If, when using the App, you integrate with a third-party Websites and Applications (TPWA), including but not limited to platforms such as Facebook, Twitter and YouTube, we will connect that third-party service to ours and the third-party provider of the integration may reveal certain relevant data about your account with the SHSCT. However, we do not receive or store your passwords or other personal information for any of these TWPA’s. Please note, TWPA’s are not exclusively operated or controlled by us and when interacting on TWPA’s, you may reveal certain personal information to third parties who have their own privacy policies. The SHSCT does not accept any responsibility or liability for these policies and recommend that users check such policies before submitting any personal data.

Analytics

We use analytics tools, such as the Microsoft Visual Studio App Centre, to collect data about the use of the App. Analytics tools collect data and have the ability to codify the number of unique users, devices, sessions and flows showing the user's journey through the app and the average length of time spent on each screen. Additionally, there will also be analysis recorded on the integrated Chabot in relation to the questions asked and responses given and whether the Chabot was able to address each query to the users’ satisfaction. We use the data we get from these tools to maintain and improve the App and other SHSCT maintained products. Access to App analytics and content management will be password restricted and limited to specific staff roles within the SHSCT (*service users will include but are not limited to Communications, HR, IT*) and allocated on a ‘need to know’ basis.

3. The way we use Personal Data and who we share it with

While providing the SHSCT with elements of your personal data associated with the device(s) used is an obligation of using the App, staff are under no obligation to activate the App.

For the processing of personal data, the law is set out in data protection legislation, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

The processing of personal data will only be done in compliance with an appropriate lawful basis and is believed to be necessary to achieve the specific purpose as listed under section 1 of this policy; Should the SHSCT consider amending how the App functions or is used, this policy will be revised in accordance with section 8 of this policy.

The SHSCT will generally collect and process your personal data in the App on the basis of explicit consent, as set out in Article 6(a) of the GDPR. Staff who download and install the App on their personal mobile device will immediately be invited to read the Privacy Notice and opt-in consent to receive push notifications and personal data being processed in accordance with the specified purpose prior to being able to use the App.

We use your personal data to provide and improve our App. Users will have an option to activate or deactivate push notifications at any stage using the settings menu on their personal mobile device.

The SHSCT will not assign, sell or disclose 'End User' personal data to any other external entity or individual without consent or an alternative lawful basis.

4. How we protect your data

The security of your Personal Data is important to us. The App is provided to the accepted industry standards necessary to protect the personal information submitted to it and uses appropriate technical and organisational measures to safeguard personal information including encryption technology (where appropriate) to enhance privacy and help prevent information security breaches.

The App has been developed and deployed by the SHSCT through collaboration with Civica UK Limited using their proprietary mobile framework and is hosted within the Belfast Health and Social Care Trust's Azure AD tenancy. This means that the data you provide us or that we collect from you via the App is stored in secure cloud storage that is owned by the Northern Ireland Health and Care System and is located in the European Economic Area (EEA) in accordance with the national guidance at this [link](#).

5. Your rights as a "Data Subject"

Under the Data Protection Act 2018 and the GDPR, data subjects whose data is processed by the SHSCT are entitled to exercise certain rights against their personal data, such as:

- The **right to be informed** of data processing activities in a clear and transparent manner (this is provided by this Privacy Notice);
- The **right of access** to all personal data currently collected and the entitlement to seek clarity regarding data collection and processing activities;
- The **right to rectification** if you believe personal data held is inaccurate or incomplete;
- The **right to erasure (right to be forgotten)** may apply when one or more specified grounds are met mandating the deletion of personal data held without undue delay;
- The **right to restrict processing** may apply in specific circumstances and is an alternative to erasure;
- The **right to data portability** in specific circumstances when a number of grounds apply;
- The **right to object** to the processing in specific circumstances;
- Rights in relation to automated decision making and profiling;

Further information on your rights can be found on the Information Commissioners website at this [link](#).

6. Data Retention

We will not retain your Personal Data for longer than is necessary under the principle of data minimisation. Records created will be retained in line with the Trust's protocol and the Department of Health "Good Management, Good Records" guidance and "Disposal Schedule". For further information, please refer to the Department of Health's website at this [link](#).

User account details will be stored for the duration of you maintaining an account. We will only retain your personal data for as long as it is required to fulfil the original purpose for which it was collected.

7. Enquiries, Concerns or Complaints

The SHSCT has duly appointed a Data Protection Officer (DPO). Should you need to contact the SHSCT's DPO directly, you can do so:

Address: Information Governance Department, Southern Health and Social Care Trust, 10 Moyallen Road, Gilford BT635JX

Tel: 028 37561466

Email: FOI.Team@SouthernTrust.hscni.net

Enquires

App Users may request to exercise any of the above rights noted in section 5, free of charge, by contacting the DPO, who will make every reasonable effort to facilitate your request.

The SHSCT aims to comply with data subject requests as quickly as possible, and normally within one calendar month of receipt; however the GDPR allows up to three months for providing a response to requests that may be considered complex. While generally there is no charge, the SHSCT reserve the right to refuse or charge an administrative fee for the furthering of any requests if they are done so in a frivolous, vexatious or excessive manner. We will inform you if an administrative charge is being applied before fulfilling your request so that you can decide whether or not to proceed.

Generic information requests may be submitted under the Freedom of Information Act 2000 and are generally addressed within 20 working days in the absence of an exemption.

Concerns and Complaints

Should you wish to lodge or discuss concerns or a complaint, please contact the DPO directly, who will be happy to assist you. Alternatively, if you are unsatisfied with the DPO's response to your concern, under Article 77 of the GDPR you have the right to lodge a complaint directly with the Information Commissioner's Office (ICO) or under Article 80, you may authorise certain third parties to make a complaint on your behalf (such as legal representation). The ICO is the UK regulator for data protection whose mission is to uphold information rights.

ICO contact information:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk

Website: <https://ico.org.uk/global/contact-us/>

8. Changes to this Privacy Notice

The SHSCT reserve the right to make changes to this policy at any time without prior consultation. When changes are made the "last revision date" at front cover page will be revised. Therefore you are encouraged to periodically review this policy document to stay informed and updated. However, should material changes, your continued agreement will be requested via the App prior to its use.