


Privacy Policy_Oct2023

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1 Introduction

- 1.1 At Archus ("we") are committed to protecting and respecting your privacy. We recognise that when you choose to provide us with information about yourself, you trust us to act in a responsible manner. We believe this information should only be used to help us provide you with a better service.
- 1.2 This Privacy Policy (together with terms and conditions and any other documents referred to on it) sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us.
- 1.3 Please note that if you use our website (archus.uk.com) you are consenting to the processing of any information you provide to us, in accordance with clauses below in this Privacy Policy.

2 Company responsibility

- 2.1 Archus is a Private Limited Company registered in England and Wales under company number 6937095. Our registered office is 101 Victoria Street, Redcliffe, Bristol, BS1 6PU.
- 2.2 The Director responsible for Data Security on behalf of Archus is Stan Coats (Executive Director).

3 Collection of your personal information

- 3.1 In operating our website, we may collect and process the following information about you:
 - Details of your visits to the website, including but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access;
 - Information that you provide by filling in forms on our website.
 - We may also ask you for information when you report a problem with our website;
 - Information provided to us when you contact us for any reason through our Websites or via one of our service centre operators or information collected by us through your emails or other communications with us;
- 3.2 We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- 3.3 When you provide personal information to us or we collect personal information from other sources, we will treat that information in accordance with this Privacy Policy.

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- 3.4 Archus is a Data Processor for personal healthcare data supplied by and processed on behalf of our clients under contract.
- 3.5 Archus is a sole Data Controller and a Data Processor of pseudonymised Hospital Episode Statistics (HES) and Emergency Care (ECDS) data under license from NHS England.

Legal basis of the HES and ECDS data processing

- 3.6 The legal basis for the processing of HES and ECDS healthcare data is:
- UK General Data Protection Regulation (UK:GDPR) Article 6, paragraph 1 (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child;
 - GDPR Article 9, paragraph 2 (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Legitimate Interests

- 3.7 Archus has carried out a legitimate interest assessment which concludes:
- That the processing of information relating to individuals who have had encounters with hospital providers is required to achieve its legitimate interest in providing consultancy services to healthcare providers to improve decision-making around the provision of future healthcare infrastructure
 - That the nature of the data being processing and the purposes for which it is being used are considered to be low risk. Any small risks will be mitigated by appropriate safeguards and controls

4 Cookies

- 4.1 The only cookies collected by the Archus website are the third party Google Analytics cookies.

5 How we use your information

5.1 The information that we collect or store relating to you is primarily used to enable us to provide our services to you. In addition, we may use personal information provided by you or gathered by us for the following purposes:

- To provide products and services requested by you;
- To recommend products and services that we believe will be of interest to you;
- To provide information on our activities and those of our partner organisations, such as promotional materials and general updates relevant to you;
- To carry out our obligations arising from any contracts entered into between you and us;
- To notify you about changes to our Websites, products or services;
- To process and respond to specific information you have requested (such as event invitations, publications, e-newsletters and press releases) and enquiries and complaints received from you;
- To contextualise comments you have made and analyse the results of online and email consultations and surveys, as part of our ongoing research activities;
- To generate anonymous statistics to help us improve the services we offer to you (these statistics will not include information that can identify you as an individual);
- To pre-populate forms on our Websites requesting information you have already provided, for your convenience and ease-of-use;
- To update our records;
- To process payments;
- For audit purposes;
- To prevent or detect fraud;
- To enable third parties to carry out any of the purposes above on our behalf

5.2 The healthcare data we collect from NHS organisations including NHS England is used for the following purposes:

- To calculate trends in activity volumes to inform the planning of future healthcare provision
- To analyse patient flows in the delivery of healthcare
- To derive performance benchmarks to provide evidence of national best practice

Storing your personal information

5.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of the information sent to us electronically and transmission of such information is therefore entirely at your own risk. Once we have received your

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information, we will use strict procedures and security features to prevent unauthorised access.

Disclosing your information

5.4 We may share your personal information with third parties in the following ways:

- We sometimes use agents and service providers to process personal information on our behalf. For example, we use third parties to maintain our Website. Where we use agents and service providers to process your personal information, we will ensure that they have adequate security measures in place to safeguard your personal information.
- We will release your personal information when we are required to do so for legal or regulatory purposes or as part of legal proceedings.
- We may give information we hold about you to third parties as part of the process of selling one or more of our businesses.
- We will not pass your information to third parties for marketing purposes if you have indicated that you do not want us to do this at the point where you submit your information on a Website.
- We may disclose your personal information to any member of our company.

6 Your Rights

- 6.1 You have the right to ask us not to process your personal information for marketing purposes. We will inform you (before collecting your information) if we intend to use your information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your information. You can also exercise the right at any time by contacting us by post at Archus, 101 Victoria Street, Redcliffe, Bristol, BS1 6PU.
- 6.2 Our website may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.
- 6.3 We cannot identify you in the healthcare data we obtain from NHS organisations. Any requests relating to your healthcare data should be addressed to the NHS provider of the care or to NHS England.

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7 Access to information

- 7.1 You have the right to request a copy of the personal information we hold about you and to access that information and require it to be corrected if it is inaccurate. We will ask for confirmation of identity before we disclose any personal information and may charge a £10 administration fee to process the request.

8 Updates

- 8.1 We may update this Privacy Policy from time to time, the latest version will be available from the Head of Corporate Services, please use the email address below to request a copy.

Keeping our records accurate

- 8.2 We aim to keep our information about you as accurate as possible. If you would like to review or change the details you have supplied to us, you may do so at any time by contacting us directly or where this facility is offered through our website/s.

9 Contacting us

- 9.1 If you have any questions, comments or requests about this Privacy Policy please contact:

- Post: Archus, 101 Victoria Street, Redcliffe, Bristol, BS1 6PU
- Email: info@archus.uk.com
- Or use the contact form on our website: archus.uk.com