

## **MY CARE RECORD (MCR) IS COMMITTED TO PROTECTING AND RESPECTING YOUR PRIVACY**

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.mycarerecord.org.uk](http://www.mycarerecord.org.uk) you are accepting and consenting to the practices described in this Privacy Policy.

For the purpose of the EU General Data Protection Regulation 2016/679 (the GDPR) and any subsequent UK legislation on data protection, the data controller is **My Care Record** (MCR)

If you have any questions regarding this privacy policy or you would like to make a request to exercise any of your legal rights, please contact us using the details set out in the “Contact and Complaints” section below.

### **INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following data about you:

#### **Information you give us.**

You may give us information about you by filling in forms on our site [www.mycarerecord.org.uk](http://www.mycarerecord.org.uk) (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for a product or service, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, submit contact details, job application or signup for email newsletters, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number.

#### **Information we collect about you.**

With regard to each of your visits to our site we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products and services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

#### **Information we receive from other sources.**

We may receive personal data about you from various third parties and public sources as set out below. We may receive information about you if you use any of the other partner websites. In this

case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

**We collect technical data from the following:**

We may also collect, use and share “Aggregated Data” such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

We do not collect any “Special Categories of Personal Data” about You (e.g. your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinion, trade union membership, information about your health and genetic and biometric data). Nor do we collect information about criminal convictions and offences on our website.

We do not collect data regarding children and individuals below 18 years. Our Service is purely for information regarding *My Care Record* programme and the benefits.

## COOKIES

Our site uses different analytics scripts which may use cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer’s hard drive.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

**For more information please see our Cookie Policy.**

## HOW WE USE YOUR INFORMATION

**Information we collect about you when you visit our website.**

We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer;

- To allow you to participate in interactive features of the service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our site about services that may interest you or them.

**Information we receive from other sources.** We may receive personal data about you from various third parties and public sources as set out below. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## WHERE WE STORE YOUR PERSONAL DATA

Except for data collected by cookies on our site, we do not specifically request or collect any personal data from anyone. However, any non-personal information collected on our site is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will not keep your personal data for longer than is necessary for the purpose or purposes for which they are collected, unless there is another legal reason for us to retain the data. We will take all reasonable steps to destroy or erase from our systems all data which is no longer required.

## YOUR RIGHTS

We endeavour to process all data in line with your rights under the GDPR. In particular, you have the following rights:

**(a)** Where we are relying on your consent to process your personal data, you can withdraw your consent to our processing your personal data at any time. You can do this at any time by changing Your “preferences” when you log in to Your account or by contacting Us at: [weccg.mycarerecord.support@nhs.net](mailto:weccg.mycarerecord.support@nhs.net) In certain circumstances, we can process your personal data without your consent in line with the lawful processing requirements in GDPR. These include (amongst other reasons) where processing is necessary to carry out a contractual obligation between us, to comply with a legal obligation, or to protect your vital interests.

**(b)** Ask us to rectify inaccurate or incomplete personal data. We would seek to rectify the data as soon as possible and usually within one month unless the request is complex.

**(c)** Ask Us to erase your personal data. This is commonly referred to as the right to be forgotten. This right is only applicable where there is no compelling reason for the continued processing of your personal data. There are some circumstances where this right to erasure does not apply and in such

cases, we would notify you of the reason(s) why we need to retain your personal data (unless prevented to do so by law).

**(d)** Restrict processing of your personal data where, for example, the data is inaccurate, being processed unlawfully or where the data is no longer relevant to the specific purpose for processing. In such cases, we would retain the data, but we would not process it further without your consent, or if processing your data is for establishing, exercising or defending a legal claim, or for the protection of rights of other individuals, or for public interest reasons. In such circumstances, we would let you know that we intend to lift the restriction on processing your personal data.

**(e)** Request access to your personal data via a subject access request. Your request should be made to us in writing by email to [weccg.mycarerecord.support@nhs.net](mailto:weccg.mycarerecord.support@nhs.net) and we may ask you for proof of your identity before providing you with the data. There is usually no fee for making such a request however, in limited circumstances, we may be able to charge an administrative fee (which will be based on the administrative cost of providing the information).

**(f)** You have the right to ask us not to process your personal data for marketing purposes (including profiling). We will usually inform you (before collecting your data) if we intend to use your data 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 data. You can also exercise the right at any time by contacting us at [weccg.mycarerecord.support@nhs.net](mailto:weccg.mycarerecord.support@nhs.net)

**(g)** Obtain and reuse your personal data for your own purposes across different services (right to data portability). This right is only applicable to data that you have provided to us, where we are processing the data based on your consent or for the performance of a contract and when the processing is carried out by automated means. Where this right applies, the data will be provided to you in a structured, commonly used and machine-readable format.

Our site 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 data to these websites.

## CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## CONTACT AND COMPLAINTS

If you have any concerns about the processing of your personal data, we hope that you will contact us in the first instance. For questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [weccg.mycarerecord.support@nhs.net](mailto:weccg.mycarerecord.support@nhs.net)

However, if you wish, you can raise your concerns directly with the Information Commissioner's Office. For details on how to contact the ICO, please go to their website <https://ico.org.uk/concerns/> or call 0303 123 1113