



Induction Guidance Privacy Notice

Horizon Strategic Partners Limited respects and values your privacy and is committed to protecting your personal data. This privacy notice tells you how we look after your personal data when you use Induction Guidance. Induction Guidance (previously known as MicroGuide) may also be referred to as “MyInfo” or “Patient Information”.

In this document, the Induction Guidance platform is called “the Platform”.

About us

The Platform is operated by Horizon Strategic Partners Limited which is part of the Induction Healthcare Group.

We are a limited company registered in England and Wales. Our company number is 06285278 and our registered office is at 20 St. Dunstan’s Hill, London EC3R 8HL.

In this document, “we”, “us” or “our” always means Horizon Strategic Partners Limited.

If you use the Platform we collect, use and are responsible for certain personal information about you. Our use of your information is regulated under the Data Protection Act 2018, the UK General Data Protection Regulation and the need to uphold the common law duty of confidentiality.

We have appointed a Head of Information Governance who is the Data Protection Officer responsible for overseeing questions in relation to this privacy notice.

Contact details

Name or title of data privacy manager: Data Protection Officer

Email Address: dpo@inductionhealthcare.com

Postal address: 20 St. Dunstan’s Hill, London, England, EC3R 8HL

ICO registration ZA248864

Purposes of our processing

The purpose of the Platform is to provide knowledge support to clinicians and their teams, and where permitted also provides information to patients. The App and WebView provide access to the published guidance from any Medical Organisation that subscribes to our service. The Content Management System (CMS) provides access to authorised clinicians within the Medical Organisation to upload, edit and review the guidance.



What we collect

When you download the App we collect your:

- Profession
- Grade
- Practice Area
- Medical Organisation

You have the option to create a user profile where you would also provide your name. This is not mandatory. Horizon SP is the controller of this data if provided. We do not collect any other personal information about you as an App user (content consumer).

You may choose to sign into the App with your social account (such as Apple; Google or Facebook). Signing up using a social media option ensures that if you change device your guidelines are transferred. No personal data is shared with the social media companies and no additional data is stored by us where this option is chosen.

If you are a Trust Admin or Content Editor, Creator or Reviewer, your employer organisation will provide us with your name and email address so that we can provide you with access to the CMS for the creation, editing or review of content. We may also use this information to contact you regarding the platform. Horizon SP is the **processor** of this information, working under instruction from your employer organisation (the **controller**).

Trust Admins, Content Editors, Creators, Reviewers and Content Consumers also have access to the Website (Web View) in order to access and consume the guidance.

When the CMS or Web View are used, your IP address may be collected. We also keep audit logs of editing and publishing activities carried out within the CMS.

The lawful basis of processing

Horizon SP is the **processor** of Trust Admin and Content Editor, Creator and Reviewer personal data provided by the employing care organisation and such personal data shall be processed under the instruction of employing care organisation (**controller**).

Where personal data is provided to create a profile, or when the CMS or Web View are used and your IP address is processed, Horizon SP is the controller of this data.

The data protection lawful basis for us to process this personal data is UK GDPR Article 6(1)(f) in that the 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.

UK GDPR Article 13 says that when a controller's processing is based on legitimate interest, data subjects must be informed of that legitimate interest. Horizon SP's legitimate interest is our commercial interests as follows:

1. to perform administrative functions in order to conduct our business and provide a service to you;
2. to provide you with the guidance relevant to you, we need to understand your role within the care organisation;
3. to provide non-marketing communications for product or customer service and support related issues;
4. to carry out analytics in relation to usage of the App.

We have conducted a legitimate interest assessment to ensure that our processing is necessary, proportionate and not intrusive.

The recipients or categories of recipients of the personal data

Horizon SP uses the following sub-processors to support with the provision of the Platform.

Amazon Webs Services (AWS)

All data is stored in the UK on Amazon Web Services (AWS) servers and is fully encrypted. The data is only accessible by the Platform backend team to provide maintenance and support to users.

Google Analytics

Google Analytics process your IP address to provide us with information such as the browser you are using and type of device you are accessing our WebView or CMS from. This information is used for improvement purposes. Google Analytics is based in the USA. There are appropriate safeguards in place to protect your data. We do not have access to your IP address.

The retention periods for the personal data

We retain the data that we collect when you download the App until you unsubscribe and uninstall the App.

For the personal data of Trust Admins, Content Editors, Creators and Reviewers we are a data processor for health and care providers and retain data in accordance with the controller's instruction. Unless otherwise instructed we retain user data (including audit logs) for 25 years or until the end of our contract with the controller (whichever is sooner).

The rights available to individuals in respect of the processing

Under certain circumstances you have the following rights under data protection legislation in relation to your personal data:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Horizon SP do not process personal information when you have subscribed to the App. If you wish to stop using the App simply uninstall it from your device.

Users of the CMS and Web View should contact us if they wish to exercise their rights:
support@horizonsp.co.uk

For any other queries or concerns about Induction Healthcare's processing of your personal data please contact our Data Protection Officer at dpo@inductionhealthcare.com

The right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with a supervisory authority about the processing of your personal data. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us, or the relevant data controller where we are acting as a data processor, in the first instance.

Changes to this privacy notice

We may amend this privacy notice from time to time, but if we do so we will notify you by providing the updated privacy notice when you next use the Platform. Every time you wish to use the CMS, Web View or App, please check this privacy notice to ensure you understand how we will use your data at that time.