

# Privacy / Transparency Notice

## Sensely UK and Your Information

Ask NHS is intended for non-emergency issues only. If you have a medical Emergency please dial 999 for the appropriate level of care.

Sensely UK is based in the United Kingdom. We are a group company of Sensely Corporation, which is based in the United States.

We are registered with the Information Commissioner as a Data Controller and our registration number is ZA194147.

We worked hard to achieve compliance with the General Data Protection Regulations and the NHS Information Governance IG Toolkit with respect to how we protect your information to deliver the Ask NHS mobile or web application (the “App”).

Our Data Protection Officer can be contacted at:

[emma.cooper35@nhs.net](mailto:emma.cooper35@nhs.net)

If you have any questions or wish to make a request in relation to your information, please contact our Data Protection Officer.

In order to provide you with the App services that you have signed up to, we must **collect, use, store** and **share** information about you, your health and the way that you have used the App.

We do not transfer information that directly identifies you outside of the UK or the European Union.

Where there is an occasional requirement to transfer information about you to the United States, we will remove information that directly identifies you.



## How Does Sensely UK **Collect** my Information?

We will collect information about you, either

1. Directly – when you enter it into the App –

2. Indirectly - when your GP links your App profile to your GP record, or when we link your profile to the NHS Spine (to match you to your NHS Number).
3. Automatically – when we collect technical information about your use of the App – see *Does Sensely UK Use My Information for Marketing?*

The information we collect will be stored electronically. The information includes **Personal Data**

- Basic details about you, such as your name, gender, email address, date of birth, NHS number, and GP system reference number

as well as **Sensitive Personal Data**

- Content of your symptom checker questions
- Outcome of the symptom checker – for example, if you made a GP appointment
- Readings and information from medical devices such as glucose meters, blood pressure monitors, pulse oximeters, pedometers, ECGs and other approved devices which you may use when using the App.

We are permitted to collect, store, use and share this information under Data Protection Legislation because, by reading and agreeing to this privacy policy, you are providing your explicit consent (reference: GDPR Article 6 (1) Consent, Article 9 (1) (a) Explicit Consent).



## How Does Sensely UK Use my Information?

Sensely UK will use your information for your care in the following ways;

- To deliver the services of the App
- To communicate with you about your use of the App, new features and respond to your enquiries
- To request feedback or send surveys to find out if the App is working well for you and how you used it
- To tailor the content and information that we send or display, and personalise help and instructions to improve your experience of the App

- To better understand how users access and use the App, both on an aggregated and individual basis, in order to improve the App and respond to user desires and preferences
- To link the data you provide to your NHS Number to allow us to communicate with your health and social care team about your use of the App
- To undertake systems administration and provide technical support for the App. This might include accessing your data in order to ensure your requests via the App are being completed.
- To audit the App, including access to the App, to ensure safety and security

To undertake these activities, your information will be shared internally across our teams. We will work to ensure that only the right people have your information and that they are only given the information they need.



## How Else Does Sensely UK Use My Information?

Along with activities related directly to your use of the App, we also use your information to check that the App is safe and to provide data for the improvement and planning of services.

This involves using your information to improve Sensely UK's products and quality assurance purposes through:

- Conducting quality assessment and clinical safety reviews, to ensure that the signposting you received was safe and of good quality (for example, was it appropriate that you were directed to self-care?)
- Training and accreditation, certification and licensing activities



## Who Does Sensely UK Share My Information With?

Sensely UK works hard to ensure that only the right people have your information and that they are only given the information they need.

- Your information will be shared internally across our teams such as our technical staff and administrative teams so that we can deliver the services described above
- When you are directed to another health care provider, we will share your information with them so that they do not have to ask you questions you have already answered

When we share information with another provider, they assume full responsibility for the lawful and secure processing of your information. You have a right to object to us sharing your information with sharing partners. Our Data Protection Officer will be happy to discuss this with you.

Sensely UK works with other companies to deliver some of our services including organisations that enable or assist with the:

- Provision of corporate data storage ([Amazon Web Services](#))
- Secure storage of App data ([RedCentric](#))
- Provision of connectivity and servers
- Undertaking of audits
- Undertaking of research

Personal data will never be made available to organisations not involved in delivering the App or providing your care without letting you know and giving you a chance to object.

We have contracts in place with these organisations that prevent them from using it in any way other than how we instruct them to. These contracts also require them to maintain good standards of security to ensure your confidentiality.



## Will Sensely UK **Share** without Asking Me?

Sometimes we will be required by law to share your information and will not always be able to discuss this with you directly.

Examples include:

- Sharing with the police or tax authorities for the detection or prevention of crime
- Where it is in the wider public interest – for example, to keep the public safe
- Safeguarding children or vulnerable adults

- When the court has told us we must share



## What are my Information Rights?

Data protection law provides you with a number of rights that Sensely UK is committed to supporting you with;

### Right to Access

You have the right to obtain:

- Confirmation that your information is being used, stored or shared by Sensely UK
- A copy of information held about you. We will respond to your request within one month of receipt or we will tell you when it might take longer.

We are required to validate your identity or the identity of someone making a request on your behalf.

### Right to Object or Withdrawn Consent

We collect, use, store and share your information because you have consented for us to do so, but you have a right to object to us doing this, and you may withdraw your consent at any time.

When you make such a request, the data will be anonymised (anything that identifies you will be removed) to ensure it is no longer personal data.

We will then only use the anonymised data for technical, quality and business purposes.

Our Data Protection Officer will be happy to speak with you about any concerns you have.

### Right to Correction

If information about you is incorrect, you are entitled to request that we correct it.

There may be occasions, where we are required by law to maintain the original information. Our Data Protection Officer will talk to you about this and you may request that the information is not used during this time.

We will respond to your request within one month of receipt or we will tell you when it might take longer.

## Restriction

When you are making requests for correction or objecting to processing, you have a right to request that we do not further share the information whilst we process your request.

We will let you know once we are no longer restricting the information.

## Portability

You have a right to request that we send you a copy of the personal data you have provided to us via the App. You may do this by emailing us to make a request. You can also ask us to send the information directly to another provider if you wish.

## Complaints

You also have the right to make complaints and request investigations into the way your information is used. Please contact our Data Protection Officer or visit the link below for more information.

For more detailed information on your rights visit <https://ico.org.uk/for-the-public/>

To make a request for any of the above, please email our Data Protection Officer on [emma.cooper35@nhs.net](mailto:emma.cooper35@nhs.net)



## Does Sensely UK Use Profiling or Automated Decision

### Making?

No. Whilst the technology that Sensely UK uses includes application of certain automatic rules to make decisions about what services might be appropriate for you based on your symptoms, the decision about how to proceed is made by you.

We will undertake profiling in relation to your information. This means we may compile reports that indicate the typical behaviour of particular App Users. This will be used for the purposes identified under **How Does Sensely UK Use My Information?**

You have a **right to object** to this and to find out the types of reports we are producing.

Our Data Protection Officer will be happy to speak to you about this if you have concerns or objections.



## How Does Sensely UK Protect My Information?

Sensely UK is committed to ensuring the security and confidentiality of your information. There are a number of ways we do this, including:

- Staff receive regular training about protecting and using personal data
- Policies are in place for staff to follow and are regularly reviewed
- We check that only the minimum amount of data is shared or accessed
- We use controlled access to systems to help ensure that the right people are accessing data – people with a ‘need to know’
- We use encrypted emails and storage which would make it difficult for someone to ‘intercept’ your information
- We report and manage incidents to make sure we learn from them and improve
- We put in place contracts that require providers and suppliers to protect your data as well
- If we send information outside of the EEA, we have EU approved assurances in place to protect it

Unfortunately, the transmission of information via the internet can never be completely secure. Although we do our best to protect both your personal data and sensitive personal data, we cannot guarantee the security of your data transmitted to the App; any transmission is at your own risk.



## How Long Does Sensely UK Store My Information?

Sensely UK will retain / store your App Registration information and Symptom Checker information until you withdraw consent.

Because Ask NHS is an App you may not use every day, we will not delete the data because you have not used the App in a while. Please let us know if you no longer wish to have an account.

When you withdraw consent / close your account, the data will be anonymised (anything that identifies you will be removed) to ensure we are not holding information about you that we no longer need.

We will then only use the anonymised data for technical, quality and business purposes.



## Does Sensely UK Use My Information for

### Marketing?

Yes, but only with your consent. As listed under **How Does Sensely Use My Information?** we will use your contact details to email you about new features and updates in relation to your App usage and request feedback or send surveys to find out if the App is working well for you.

You can ask not to be contacted in this way by using the unsubscribe link within the notifications and email.

We use automated third-party devices and applications, such as Google Analytics, to evaluate usage of the App and our website. We use these tools to help us improve our services, performance and user experiences. These entities use cookies and other tracking technologies to perform their services. We do not share your personal information, such as your IP address with these third parties.



## How does the App use my Information?

When you register with the App, your information will be shared with our partner organisations in the following ways:

1. Your name, date of birth, gender and postcode will be sent to our secure servers for storage
2. Your name, date of birth, gender and postcode will be sent to a spine-matching service who will match your details with your NHS Number and return to our secure servers
3. Your NHS Number will be sent securely to GP systems to link with your patient record number (the GP will not see this)

When you speak to Olivia, your information will be shared with our partner organisations in the following ways:

1. You provide Olivia with information about how you are feeling and your symptoms
2. This information is sent securely to our secure servers for storage
3. This information is sent to Adastra to help us provide the correct signposting to services
4. Your symptom checker information will be shared with our 111 provider, if you are directed to this service

When you make an online appointment with your GP through the App, your information will be shared with our partner organisations in the following ways:

1. You provide Olivia with consent to share the results of your conversation
2. This information is then sent securely to the GP practice system and an appointment is made