

# Data Privacy Statement

Screen4 (Yorkshire) Ltd treats the privacy of its customers and website users very seriously and we take appropriate security measures to safeguard your privacy. This Policy explains how we protect and manage any personal data\* you share with us and that we hold about you, including how we collect, process, protect and share that data.

\*Personal data means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address and an email address or other contact information, whether at work or at home.

## How we obtain your personal data

### Information provided by you

You provide us with personal data either by entering the information into our website forms, email or over the telephone. This may include your name, address, date of birth, email address and contact number. We use this information in order to manage and administer your Drug and Alcohol program or Covid-19 services.

We may also keep information contained in any correspondence you may have with us by post or email. We also record telephone conversations.

We may obtain sensitive information directly from you face to face, or via the online forms completed on <https://www.Screen4.org>. The provision of this personal data is essential for us to be able to administer your request for Drug and Alcohol testing or Covid-19 testing services, including verifying your identity when you contact us to discuss your account.

### Legal basis under GDPR and Data Protection Act 2018

- processing personal data is necessary for the performance of a contract
- or if requested by the data subject, for the preparatory steps to enter into a contract.

This request does not have to be expressly worded – if prospective patients and/or clients complete a purchase to use the services of Screen4 Ltd, then their request to process the data is implied.

- **Article 6(1)(b)** - the processing is necessary for the performance of a contract to which the data subject is a party; or. In order to take steps at the request of the data subject prior to entering into a contract.

### When collecting Special Category Data

- **Article 9(2)(h)** – the processing is necessary for the management of health/social care systems or services/ medical diagnosis.
- Data Protection Act 2018 – Schedule 1, Part 1, (2) (2) (f) – health or social care purposes.

### Information we get from other sources

We only obtain information from third parties if this is permitted by law. We may also use legal public sources to obtain information about you, i.e. to verify your identity.

This information (including your name, address, email address, contact details etc.), as relevant to us, will only be obtained from reputable third-party companies that operate in accordance with General Data Protection Regulation (GDPR). You will already have submitted your personal data to these companies and specifically given permission to allow them to pass this information to other companies that provide similar or complementary products and services to those we offer.

## How we use your personal data

We use your personal data to manage and administer Screen4 testing services. We undertake at all times to protect your personal data, including any financial details, in a manner which is consistent with Data Protection

Regulation (GDPR) concerning data protection. We will also take reasonable security measures to protect your personal data in storage.

### **Do we use your personal data for marketing purposes?**

Any information that you choose to give us will not be used for marketing purposes by us. We will hold your personal data only for the purposes of administering and managing the services or products you have chosen to purchase from us.

## **Sharing information**

We will keep information about you confidential and we will from time to time share some of your personal data with our approved subcontractors or suppliers for the purposes of completing Drug and Alcohol and Covid 19 services. We only disclose your information with other third parties with your express consent, except for the following categories of third parties:

- Approved Testing Laboratories, Courier services (e.g. Royal Mail, DPD Local), DHSC, PHE, Product Fulfilment, Safe4 Account.
- Any contractors, suppliers or advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential;
- Anyone to whom we may transfer our rights and duties under any agreement we have with you;
- Any legal or crime prevention agencies and/or to satisfy any regulatory request (including recognised practitioner bodies) if we have a duty to do so or if the law allows us to do so.

### **Transfer of your personal data outside of the European Economic Area (EEA)**

We do not currently transfer your personal data outside the EEA. If in the future we transfer your personal data, in accordance with the terms of this Policy outside of the EEA, we will make sure that the receiver agrees to provide the same or similar protection as we do and that they only use your personal data in accordance with our instructions.

If you require further information regarding such transfers, please write to the DPO at Screen4 (Yorkshire) Ltd, 17 Middlewoods Way, Carlton, Barnsley, S71 3HR.

### **How long do we keep this information about you?**

We keep information in line with the retention policy of Screen4. These retention periods are in line with the length of time we need to keep your personal information in order to manage and administer the Drug and Alcohol and Covid 19 services. They also consider our need to meet legal, statutory and regulatory obligations. These reasons can vary from one piece of information to the next. In all cases our need to use your personal information will be reassessed on a regular basis and information which is no longer required will be disposed of.

## **Data subject rights**

### **Subject access requests**

The General Data Protection Regulation (GDPR) grants you (hereinafter referred to as the “data subject”) the right to access particular personal data that we hold about you. This is referred to as a subject access request. We shall respond promptly, and certainly within one month from the point of receiving the request and all necessary information from you. Our formal response shall include details of the personal data we hold about you, including the following:

- Sources from which we acquired the information;
- The purpose for processing the information; and
- Persons or entities with whom we are sharing the information.

### **Right to rectification**

You, the data subject, shall have the right to obtain from us, without undue delay, the rectification of inaccurate personal data we hold concerning you. Considering the purposes of the processing, you, the data subject, shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **Right to erasure**

You, the data subject, shall have the right to obtain from us the erasure of personal data concerning you without undue delay.

### **Right to restriction of processing**

- a) Subject to exemptions, you the data subject, shall have the right to obtain from us restriction of processing where one of the following applies:
- b) the accuracy of the personal data subject is contested by you, the data subject, and is restricted until the accuracy of the data has been verified;
- c) the processing is unlawful and you, the data subject, oppose the erasure of the personal data and instead request the restriction in its use;
- d) we no longer need the personal data for the purposes of processing, but it is required by you, the data subject, for the establishment, exercise or defence of legal claims;
- e) you, the data subject, have objected to the processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections.

### **Notification obligation regarding rectification or erasure of personal data or restriction of processing**

We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall provide you, the data subject, with information about those recipients if you request it.

### **Right to data portability**

You, the data subject, shall have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hindrance from us.

### **Right to object**

You, the data subject, shall have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of you, the data subject, or for the establishment exercise or defence of legal claims.

### **Right to not be subject to decisions based solely on automated processing**

We do not carry out any automated processing, which may lead to an automated decision based on your personal data.

### **Invoking your rights**

If you would like to invoke any of the above data subject rights with us, please write to the DPO at Screen4 (Yorkshire) Ltd 17 Middlewoods Way, Carlton, Barnsley, S71 3HR or email [dataprotection@screen4.org](mailto:dataprotection@screen4.org)

## **Accuracy of information**

In order to provide the highest level of customer service possible, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear, and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

## **Important information**

### **Questions and queries**

If you have any questions or queries which are not answered by this Privacy Statement or have any potential concerns about how we may use the personal data we hold, please write to the DPO at Screen4 (Yorkshire) Ltd 17 Middlewoods Way, Carlton, Barnsley, S71 3HR.

### **Policy changes**

This Privacy Statement is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to modify or amend this Policy. We suggest that you review this Privacy Statement from time to time to ensure you are aware of any changes we may have made; however, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this policy can be obtained on request.

### **If you have a complaint**

If you have a complaint regarding the use of your personal data or sensitive information then please contact us by writing to the DPO at Screen4 (Yorkshire) Ltd 17 Middlewoods Way, Carlton, Barnsley, S71 3HR and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO). You can contact them on 01625 545745 or 0303 123 1113. You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights under this regulation have been infringed as a result of the processing of your personal data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation.