



ShannonDoc CLG
Urgent Out of Hours Doctor Service
St Camillus Hospital, Shelbourne Road, Limerick V94 5V24
Tel: (061) 459527 (Office Hours Only)
Tel: 0808 123 500 (Out of Hours)
Email: info@shannondoc.ie

Privacy Statement

Introduction

ShannonDoc is the out of hours Urgent Doctor service covering the mid-west region of Ireland. We are committed to provide the highest quality of service and care to the patients of our member doctors and visitors to the area. In providing this service, we need to collect and use certain information about you when you access our service. ShannonDoc is committed to protecting your privacy and takes the security of your information very seriously.

We collect and use personal data in a way that is consistent with our obligations and your rights under General Data Protection Regulation (GDPR) 2018 and Data Protection Acts 1988-2018. ShannonDoc aims to be clear and transparent about the personal information we collect about you and how we use this information.

This Privacy Statement will set out the following:

- What Personal Data we collect
- How we collect your Personal Data
- Purposes for using your Personal Data
- How we store your Personal Data
- Your Rights under General Data Protection Regulation (GDPR)
- Changes to our Privacy Statement
- How to contact us
- How to contact the appropriate authority

1. What Personal Data We Collect

When you contact the service in the out of hours you will be asked for the following

Patient Information:

- First name and surname
- Contact telephone number
- Date of Birth
- Gender
- Home address and current location
- Name of own GP
- If applicable, medical card details, number and expiry date
- A description of the presenting medical condition
- If you are not the patient, your name and relationship to the patient, e.g., parent, next of kin, carer etc.

2. How We Collect Your Personal Data

When you contact ShannonDoc for the first time, your call is answered by an operator (PCA, Patient Care Administrator) at our Patient Contact Centre. A record of your personal details (listed above) is created and stored electronically.

You will be consulted by a nurse and or GP where your medical records, i.e. current and past medical, surgical and family history, allergies, medication history, diagnosis, treatment provided, prescribed medications, examination outcomes etc. (medical data is classed as Special Category of Personal Data) are electronically stored in your record on our Patient Management System

In general, records are stored electronically but they can also be stored manually on paper, on audio recording device, phones or CCTV recording

Your call to us and the nurse response to you are audio recorded for training and quality purposes.

Your personal and medical data may also be provided to us by third parties who are contributing to your wellbeing, e.g. your carer, your GP or other health professionals.

Note: Should you contact ShannonDoc during office hours, and you wish to make a payment for a consultation, your call is transferred to a private line and is not recorded. Your debit/credit card information is not stored on our systems and is used on a once only basis.

ShannonDoc for the most part is the data controller.

3. Purposes For Using Your Personal Data

Your personal and medical data is used to provide you with the highest and continuous medical treatment.

Your ShannonDoc consultation is transferred electronically, post consultation to your GP to ensure the continuity of your medical care.

Your information is also necessary to support the administration function within ShannonDoc, e.g. accounts and billing, submission of reimbursement claims to the HSE, patient consultation receipts, complaints, data access requests etc.

It may also be used as a source of information for handling legal claims, Public Health requirement etc.

Any health data used for statistical purposes is anonymised.

4. How We Store Your Personal Data

Your record is electronically stored securely on our Patient Management System (Spectrum) and is easily accessible when and if you again need to use our service. The system includes a secure trail to prevent data erasure and to guard the data, time and author of data entries and alterations. All entries, including amendments are retained on the record. An electronic log is created for each access to a patient's record. ShannonDoc implements appropriate technical and organisational measures to ensure protection of your data including MFA on user devices, Sophos Central Server, Sophos Central Device Encryption, Firewalls installed at sites and access controlled by secure VPN.

We are always mindful of the security of your personal data and adhere to the principles of Data Protection in that:

- Your information is obtained and processed fairly
- Your information is retained for one or more specific and lawful purpose
- Your information is used and disclosed only in ways compatible with the reasons for which it was obtained
- Your information is kept safe and secure
- Your information is kept accurate, complete and up to date
- Your information is adequate, relevant and not excessive
- Your information is retained no longer than necessary
- You are entitled to request a copy of your personal information

Disposal

When a record exceeds the requirement for retention under regulations, that record is carefully and safely disposed. ShannonDoc engage "Security in Shredding" a licenced operator for this purpose who work on site and dispose of manual and IT records. A certificate of proof is provided after each event and as listed under contract conditions

ShannonDoc shares patient health data under four categories:

Health & Social Care Providers:

These providers include your GP, ShannonDoc's Medical Director e.g. for dealing with any medical complaints or quality issues. Palliative care teams, ambulance services, nursing homes, pharmacies, Health Executive Services e.g. Covid-19 referrals, Hospital A&E referrals, Social Care Workers

Data Processors with a Contract

ShannonDoc Software suppliers, IT security and on-line Data Backup companies, Healthlink, Healthmail and other secure health links which provide for the safe transfer of data.

Legal Arrangements/Public Health, Safety.

ShannonDoc may be requested to share information with the Coroner, Social Protection, Revenue, Medical Council, Gardai, HSE, Public Health (infectious disease notifications, influenza and Covid-19 surveillance).

Third Parties with Explicit Patient Consent

Solicitors, Insurance companies, Health Insurance companies, HSE, IT processors

The above lists are not exhaustive.

ShannonDoc will ensure that appropriate security measures are implemented to protect your data both in manual and electronic form. All staff are fully trained in the importance of confidentiality and privacy surrounding personal and medical data and they must adhere to the relevant policies which are in place.

5. Your Rights under the General Data Regulation (GDPR)

Under certain circumstances, by law you have the following:

5.1 Right of Access

You have the right to request a copy of the personal information we hold about you. Parents, legal guardians and next of kin can also make a request. Visit www.shannondoc.ie to download the correct form and enclose the necessary ID documents which are required.

5.2 Right of Rectification

You have a right to correct data that we hold about you that is inaccurate, incomplete or out of date.

5.3 Right to be Forgotten

In certain circumstances you can request for the personal data we hold about you to be erased from our records. This is not an absolute right and restrictions may apply.

5.4 Right to Restriction

Where certain conditions apply, you have the right to restrict the processing of your personal data by us where you feel the personal data is not accurate, not up to date, being processed unlawfully or is no longer necessary for us to retain such data.

5.5 Right of Portability

Where certain conditions apply, you have the right to have all the data we hold about you transferred to another organisation. Such a request would be refused should this action, in an adverse way affect the rights of others.

5.6 Right to Object

You have the right to object to the processing of your personal data if that data is no longer required.

5.7 Right to Review

Should ShannonDoc refuse your request under right of access, we will provide you with the reasoning behind the refusal

5.8 Right to lodge a Complaint

If you believe that ShannonDoc has not complied with the stipulation under GDPR regarding your personal data, you have the right to lodge a complaint to the Data Protection Commissioner.

6. Changes to our Privacy Statement

ShannonDoc keeps its Privacy Statement under regular review and places any updates on this Web page.

7. How to Contact us

If you have any questions about ShannonDoc's Privacy Statement, the personal data we hold about you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us

Deirdre Walsh is the Data Protection Officer for ShannonDoc and is responsible for ensuring compliance with Data Protection legislation and can be contacted at the above address or email:

deirdrewalsh@shannondoc.ie

8. How to contact the Appropriate Authority

If you require further information on Data Protection, please contact the Offices of the Data Commissioner
(The Supervisory Authority)

Offices of the Data Commissioner

www.dataprotection.ie <https://www.dataprotection.ie>

Telephone

09:30 - 13:00hrs (Monday - Friday)

14:00 - 17:30hrs (Monday - Friday)

01 7650100 / 1800 437 737

Postal Address

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland