



What is a Privacy Policy?

A 'privacy notice' lets you know what happens to any personal data that you may give us or that we may collect from you or about you (as a patient, family member, carer, or visitor). This notice is issued by Care-Connect as a primary care healthcare provider and covers the information we hold about our patients, their families, and other individuals who may use our services.

Who are we and what do we do?

- A multi-phase partnership between Irish Life Health and Centric Health was established on 01 November 2022.
- An innovative, primary healthcare service that blends in-person and digital experience to provide easy and convenient access to expert care and personalised health advice.
- Care-Connect will support better health and lifestyle outcomes for customers.
- Care Connect is available to patients through its individual hospital-based programmes.

Why have we issued this Privacy notice for our patients, families, and others?

We are committed to being open about the information we collect about you, how we use this information, with whom we share it, and how we store and secure it. We recognise the importance of protecting personal and confidential information in all that we do and take care to meet our legal and other duties, including compliance with relevant laws, regulations, and guidance.

Under the General Data Protection Regulation (GDPR) Care-Connect has a legal duty to ensure patient data, supplied as part of the patient process within Care-Connect, is kept secure and safe.

Personal data will be obtained in a lawful, fair, and transparent manner for a specified purpose and will not be disclosed to any third party, except in a manner compatible with that purpose.

"Personal data" means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller ("Care-Connect"). All medical information is seen as "sensitive personal information", and we will endeavour to ensure your information is treated with the utmost respect and confidentiality.

Care-Connect will conform to the Medical Council guidelines and the privacy principles of the Data Protection Legislation. This Privacy Statement is about making your consent meaningful by advising you of our policies and practices on dealing with your medical information.

Who controls the use of your personal data?

Care-Connect whose registered address is Care-Connect, Floor 7, Intact House, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16, D16 FC92 is the company that controls and is responsible for personal data that is collected in relation to your healthcare. If you have any queries in relation to the processing of your personal data, we have appointed a data protection officer that you can contact as follows:

by post at:

Data Protection Officer, Care-Connect, Floor 7, Intact House, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16, D16 FC92

or by email at: dpo@care-connect.ie

Managing your Information

1. To provide for your care we need to collect and keep information about you and your health on our records. The type of information we need to collect from you includes your name, address, personal phone number, date of birth, marital status, nationality, family history, ethnic background, current lifestyle, next of kin/emergency contact details and details regarding previous medical history.
2. Upon receipt of a completed "register your interest form" we use this data to communicate with you in the interests of your own healthcare but will not forward it to anyone else without your expressed consent.
3. We will only ask for and keep information that is necessary. We will attempt to keep it as accurate and up to date as possible. We will explain the need for any information we ask for if you are not sure why it is needed.
4. Please inform us about any relevant changes that we should know about, such as change of address, phone numbers, family circumstances, or any new treatments or investigations being carried out that we are not aware of.
5. All persons working for Care-Connect (not already covered by a professional confidentiality code) sign a confidentiality agreement that explicitly makes clear their duties in relation to personal health information and the consequences of breaching that duty.

6. Access to patient records is regulated to ensure that they are used only to the extent necessary to enable the Clinicians and/or Admin team to perform their tasks. In this regard, patients should understand that Care-Connect staff may have access to their records for:
 - To provide the Care-Connect service safely and efficiently to ensure appropriate documentation is maintained relating to a patients care.
 - Opening letters from GP Practices, hospitals and consultants. Letters will be scanned into their electronic patient record.
 - Scanning clinical letters, radiology reports and any other documents not available in electronic format.
 - Dealing with patient complaints.
7. Care-Connect is committed to guarding against accidental disclosures of confidential patient information. Before disclosing identifiable information about patients, Care-Connect will:
 - Take into consideration Freedom of Information and Data Protection principles.
 - Be clear about the purpose for the disclosure.
 - Be satisfied that we are disclosing the minimum information to the minimum amount of people necessary.

What personal data is collected?

In order to provide our services to you we need to process certain personal data in relation to you, which includes:

- Demographic data: name, assumed names, address, phone number, email address, gender, family relationships (e.g. spouse, children), date of birth.
- Interactions with us – If you interact with us, we will record details of those interactions (e.g. phone calls and logs of phone calls, email correspondence, and hard copy correspondence). If you make a complaint, we will process details in relation to that complaint.
- Online services – When you interact with us online (by computer, tablet, or smartphone), you will often provide personal data to us, which you will be aware of when using the services or for which you give consent. We also automatically collect data about your use of our services, such as the type of device you are using and its IP address, and how you interact with the services.

Care-Connect relies on a combination of lawful bases depending on the nature of the processing activity. These include contractual necessity, compliance with legal obligations, legitimate interests, and, where appropriate, patient consent. Special category data, including health data, is processed in accordance with Article 9 GDPR conditions applicable to healthcare provision and public health.

Category of data	Purpose of Processing	Lawful of processing
<p>Administrative: name, address, contact details (phone, mobile, e-mail), dates of appointments</p>	<p>Necessary to support the administration of patient care.</p> <p>Required for providing a service and billing</p> <p>Contact details provided to clinical device providers for the delivery of healthcare equipment necessary to participate in the programme.</p>	<p>Article 6(1)(b) GDPR – Performance of a contract: processing is necessary to provide Care-Connect services, including appointment management and programme delivery.</p> <p>Article 6(1)(c) GDPR – Legal obligation: processing is required to comply with applicable healthcare, taxation, and regulatory obligations.</p> <p>Article 6(1)(f) GDPR – Legitimate interests: processing is necessary for the efficient administration of services, including coordination with clinical device providers, communications, and service improvement, provided these interests are not overridden by the rights and freedoms of the data subject.</p>
<p>Medical Record: Individual Health identifiers, GMS number, PPSN, date of birth, religion, sexual orientation, gender, family members, family history, contact details of next of kin, contact details of carers, vaccination details, medication details, allergy details, current and past medical and surgical history, genetic data, laboratory test results, imaging test results, near-patient test results, ECGs, Ultrasound scan images, and other data required to provide medical care.</p>	<p>Necessary to provide patient care in general practice.</p>	<p>Article 6.1(e) GDPR: the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; Special Categories are processed under the derogations in Articles 9.2(h) and 9.2(i) GDPR.</p> <p>Article 6(1)(b) GDPR: processing is necessary for the performance of a contract (to provide healthcare services to you under the Care-Connect programme);</p> <p>Article 6(1)(c) GDPR: processing is necessary for compliance with a legal obligation (e.g. professional,</p>

		<p>clinical record-keeping and other regulatory obligations applicable to healthcare providers).</p> <p>Special category data (health data):</p> <p>Article 9(2)(h) GDPR: processing is necessary for medical diagnosis, the provision of health or social care or treatment, and the management of health systems and services, carried out by or under the responsibility of a health professional subject to confidentiality;</p> <p>Article 9(2)(i) GDPR (where applicable): processing is necessary for reasons of public interest in the area of public health (e.g. notifiable disease reporting / ensuring high standards of quality and safety of healthcare) in accordance with applicable law and safeguards.</p>
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Recipients with whom we share personal data

Categories of Recipient	Description
Health and Social Care Providers	Other GPs, Health Service Executive, Voluntary Hospitals, Private Hospitals and Clinics, Pharmacies, GP Locums and other health care providers
Data Processors with a contract	<p>Irish Life Health: referral of eligible members</p> <p>Vhi: referral of eligible members</p> <p>Luscii Vitals: who operate as software vendors. https://luscii.com/en-gb/privacy</p> <p>Clanwilliam [Socrates] Patient Administration System [PAS]. https://www.socrates.ie/privacy-statement/</p> <p>Healthmail: secure transmission of Prescriptions & referrals to another medical professional. https://www2.hse.ie/privacy-statement/</p>

	<p>Jotform: Online patient forms and questionnaires. https://www.jotform.com/privacy/</p> <p>Promed: Medical equipment provider. https://promedmail.org/privacy-policy/</p> <p>Itamar: Medical equipment provider. https://www.itamar-medical.com/privacy_policy.htm</p> <p>Airmid Medical: provider of sleep apnoea testing device</p>
Legal Arrangements	Coroner, Medical Council, Tusla
Third Parties – This will only be actioned under explicit patient consent	Solicitors, Research facilities

How we use and process your data

Care-Connect processes patients’ clinical information to ensure that all members of the clinical team have access to complete and accurate records. This enables us to provide you with the highest standard of care while you are with us. Each patient is assigned a unique medical record in which all relevant information is securely stored, and access to this record is strictly controlled.

We use your personal data to deliver our services and to support the effective operation of our organisation. In accordance with data protection laws, we must have a lawful basis for processing your personal data and inform you of what that basis is. Depending on the activity, our lawful bases include: (a) processing necessary for the performance of a contract with you (Article 6(1)(b)); (b) processing necessary to comply with a legal obligation (Article 6(1)(c)); (c) processing necessary for our legitimate interests (Article 6(1)(f)) where those interests are not overridden by your rights and freedoms; and (d) where we rely on consent, processing based on your consent (Article 6(1)(a)) which you can withdraw at any time without affecting your care. Where we process special category health data, we do so under the relevant Article 9(2) conditions (in particular Article 9(2)(h) for healthcare provision).

In order to appropriately record your clinical data, we may use an AI scribe during your consultation. The scribe listens to the interaction and drafts a medical note for your clinician or nurse. Importantly, the AI scribe does not store or save your conversation, all data is deleted at the end of the session. Your clinician or nurse remains fully responsible for reviewing the draft and ensuring that the medical note accurately reflects the consultation, including the details discussed and the next steps agreed. At the beginning of your consultation, you will be asked for your consent to use the AI scribe. If you prefer not to use it, this will not affect your care in any way, and your consultation will continue as normal. Care-Connect does not

use AI systems to make decisions about patients based solely on automated processing that produce legal or similarly significant effects (Article 22 GDPR).

Analysis of data

We process certain data where necessary for our legitimate interests, including improving our services, ensuring operational efficiency, and maintaining patient safety. We ensure that these interests do not override your fundamental rights and freedoms. Care-Connect may analyse patient data to monitor, evaluate, and improve the quality, safety, and effectiveness of the services we provide.

Where possible, data used for analysis is anonymised so that individuals cannot be identified. In some cases, we may use pseudonymised data, where identifying details are replaced with unique codes. Strict safeguards are in place to ensure that such data remains secure and is accessed only by authorised personnel.

Care-Connect may also use data for clinical research purposes, including collaboration with clinicians, hospitals, and academic institutions, to advance healthcare knowledge and outcomes. Where research involves identifiable personal data, or where required by law, this will only take place with your explicit, informed consent. You will be provided with full details of any research study, and your participation will always be voluntary. Any research involving your data is conducted in accordance with the Data Protection Act 2018 and the Health Research Regulations, including ethical approval and consent requirements where applicable.

All data processing activities are subject to strict confidentiality obligations, robust security measures, and governance controls to protect your privacy. We are committed to ensuring that your personal data is handled lawfully, fairly, and transparently at all times.

If you have any questions about how your data is used, including for analysis or research, please contact us for further information.

Legal Requirements

In certain circumstances, we are required by law to report information to the appropriate authorities. This information is often provided after authority has been given by a qualified health professional. For example:

- Where we encounter infectious diseases, which may endanger the safety of others e.g. COVID 19, meningitis or measles

- Where a formal court order has been issued
- Section 7(1)(a) of the Ombudsman Act 1980 provides the Ombudsman with powers to acquire information or documents for the purpose of a preliminary examination or investigation by him or her under the Act.
- Ombudsman for Children: Section 14 of the Ombudsman for Children Act 2002 provides the Ombudsman for Children with the power to acquire information.

The Data Protection Commissioner may, for the purposes of the investigation of a complaint under the Data Protection Acts, require the Care-Connect to provide any documentation as is considered necessary information or documents for the purpose of a preliminary examination or investigation.

Transfers outside of the European Economic Area (EEA)

Care-Connect processes your data within the EEA.

Your Rights

Under GDPR, you have rights regarding the use of your personal details and Care-Connect as controller of that data has a responsibility in how we handle this information. You have the right to access your data, rectify inaccurate data, erase data (in certain circumstances), restrict processing, data portability, object to processing and withdraw consent at any time. You also have the right to lodge a complaint with the Data Protection Commission if you believe your data protection rights have not been upheld.

What is the aim of these rights?

With Data Protection rights we help you to make sure that the information stored with us about you is:

- Accurate and up to date.
- Only available to those who should have it.
- Only used for stated purposes.
- Stored securely

What should you expect?

- Expect fair treatment from Care-Connect and our staff in the way we obtain keep, use and share your information.
- That you have the right to be fully informed in why we are collecting your information and how we are using it.
- That you have the right to object to Care-Connect using your details for a particular purpose.

- That you have the right to ensure inaccurate information about you is corrected when it is safe to do so.
- Request to see a copy of all information kept about you unless exceptional circumstances apply
- Complain to the Data Protection Commissioner if you feel your data protection rights are being infringed.

What Care-Connect must do?

Care-Connect will comply with the Principles of GDPR

- To obtain information lawfully, fairly and transparently.
- Collect only data necessary for a specific purpose(s) and only use this data for set purpose
- Ensure the information is accurate and up to date. We will need your help for this, so please inform us if you have changed any contact or next of kin details.
- Data is stored as long as necessary to provide excellent care
- We will endeavour to keep your data safe and secure.

Right to obtain a copy of your information

Under GDPR, you have a right to obtain a copy, clearly explained, of any information relating to you kept on a computer or in a structured manual filing system or intended for such a system by any entity or organisation.

A request for access can be made by completing the attached 'Subject Access Request' from the website <https://www.care-connect.ie> and emailed to: info@care-connect.ie. Alternatively, you can write to the Data Protection Officer, Care-Connect, Floor 7, Intact House, Dundrum Town Centre, Sandymount Road, Dundrum, Dublin 16, D16 FC92.

Please provide the following details:

- Legal name & date of birth
- Appropriate identification example Current Irish Driver's License, Valid Passport and Proof of address example a current utility bill. This is to make sure that personal information is not given to the wrong person.

Once you have made your request, you must be given the information within 30 calendar days, free of charge. A charge will only apply if the request is deemed to be excessive or repetitive in nature. If there are to be any delays we will contact, you and keep you up to date.

Can access be refused?

Access can be refused to some or all of the patient's personal health information, only, if providing access is likely to cause serious harm to the physical or mental health of the requester or providing access would disclose the personal data of another person without their consent or would disclose a confidential expression of opinion about the requester.

Retention of personal data

Care-Connect will retain medical records in line with Irish healthcare guidelines, typically for a minimum of 8 years after last contact. Other data is retained in accordance with legal and regulatory requirements. This means that the retention period for your personal data will vary depending on the type of personal data. For further information about the criteria that we apply to determine retention periods please see below:

- Statutory and regulatory obligations – As we work in a highly regulated industry, we have certain statutory and regulatory obligations to retain personal data for set periods of time.
- Managing legal claims – When we assess how long we keep personal data we take into account whether that data may be required in order to defend any legal claims which may be made. If such data is required, we may keep it until the statute of limitations runs out in relation to the type of claim that can be made.
- Business requirements – As we only collect personal data for defined purposes, we assess how long we need to keep personal data for in order to meet our reasonable business purposes.

Data Protection Officer

If you have any questions about your data protection, you may contact Care-Connect's Data Protection Officer:

Email: dpo@care-connect.ie

Letter: Data Protection Officer, Care-Connect, Floor 7, Intact House, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16, D16 FC92