

Lincoln Co-op Pharmacy
FAIR PROCESSING NOTICE

INTRODUCTION

This is the Fair Processing Notice of the Pharmacy of Lincoln Co-op Chemist Ltd and should be read in conjunction with the Lincolnshire Co-op website Privacy Policy, which you can find at <https://www.lincolnshire.coop/privacy-policy>. The Lincoln Co-op Chemist Ltd acts as a Joint Controller with the Lincolnshire Co-operative Ltd (collectively referred to as "we", "us" or "our" in this Notice) we are the controllers and responsible for your personal data.

This Fair Processing Notice aims to give you information on how we collect and process your personal data, including any data you may provide through our website or via any other means such as over the telephone, in our pharmacies, third parties, and the NHS or your General Practitioner (GP).

Contact details

Our full details are:

Full name of legal entity:	Lincolnshire Co-operative Chemists Limited
Postal address:	15-23 Tentercroft Street, Lincoln, LN5 7DB
Email address:	dataprotection@lincolnshire.coop
Telephone number:	07485 900727

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please *contact us* in the first instance.

Changes to the Privacy Policy and your duty to inform us of changes

We keep this Notice under regular review. This version was last updated in June 2024 and historic versions can be obtained by *contacting us*. It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of the details you provide to us should change, during the course of your relationship with us.

1. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- (A) Identity Data**
This includes data relating specifically to your identity, such as your first name, maiden name, last name, username or similar identifier, title, date of birth and gender at birth.
- (B) Contact Data**
This includes data relating to how you may be contacted, such as your billing address, delivery address, email address and telephone numbers.
- (C) Health Data**
This includes data relating to your health and pharmacy services provided to you.
- (D) Transaction Data**
This includes data relating to the transactions you have carried out with us, such as details about payments to and from you and other details of products and services you have purchased from us.
- (E) Technical Data**
This includes more technical data that we may obtain when you make use of our website, such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- (F) Profile Data**

This includes the data that we receive when you create a profile on our website and make use of that profile, such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

(G) Usage Data

This includes information about how you use our website, products and services.

(H) Marketing and Communications Data

This includes your preferences in relation to whether you want to receive marketing from us and our third parties and also your communication preferences which include our text messaging service

Special Categories of Personal Data

We collect the following special categories of personal data about you. Details about your:

- dietary requirements which may disclose your religious or philosophical beliefs.
- health data from the NHS or GP including prescription medicines and data from other pharmacy and health care services we provide to you (including, for example, pharmacy medicines, new medicine service, flu vaccinations, stop smoking services and other healthcare services).
- race or ethnicity.
- sex life and/or your sexual orientation.
- genetic and biometric data.

We process your personal data in the performance of a public task, for the provision of healthcare and treatment and the management of healthcare systems. Our pharmacists are responsible for the confidentiality of your information.

We share information with NHS bodies to fulfil our legal obligations as a provider of pharmacy and other health care services, or where we have a duty of care to do so.

2. HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through the following means:

- You may give us your Identity, Contact and Health Data by filling in forms or by corresponding with us directly at our pharmacies or by post, phone, website, email or otherwise.
- We may collect your health data directly from the NHS to provide you with health and care services or administer your prescriptions.
- We may also collect your data from our partners or companies that provide services on our behalf.
- We may collect your data when we purchase another pharmacy, to ensure continue care and support for patients.
- We collect your images and video via our CCTV and Body cameras at our pharmacies. We only activate the use Body Cameras where there is a risk that a crime will be committed or need to record an ongoing incident at our pharmacy. We have an escalation approach to recording and you will be notified if you are to be recorded at the time by the operative.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Your care** – providing pharmacy services and care to you and, as appropriate, sharing your information with your GP and others in the wider NHS.

- **Our payments** – sharing your information with the NHS Business Services Authority, others in the wider NHS, and sometimes Local Authorities, and only limited information to those external to the NHS who negotiate and check the accuracy of our payments; and,
- **Management** – sharing only limited information with the NHS Business Services Authority and others in the wider NHS, and sometimes Local Authorities; as well as those external to the NHS who ensure we maintain appropriate professional and service standards and that your declarations and ours are accurate.
- **To Improve our Pharmacy Services & making Informed Business Decisions** – we may use your data to conduct research or analysis towards a pharmacy project or make decisions on how to improve our services and \ or internal operations. We will ensure we anonymize your data and put appropriate safeguards in place before we do or share with third party.
- We may process **demographic** data sourced from the Patient Medical Record (PMR) for betterment of health under our public interest exemption.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by *contacting us*.

Third Party Partners and Contractors we may share your personal data with

We have set out below, in a table format, our key service providers, a description of all the ways we plan to use your personal data and to provide health care services when you register for their services through us or when we engage them to provide the services, we provide for you.

The legal basis for processing your personal data is public interest, to provide you with care and support you have requested or to fulfil our legal or contractual obligations to NHS, regulatory bodies and government

Third Party Partner	Purpose/Activity	Type of data
Pharmadoctor	Private Healthcare Services including, but not limited to: <ul style="list-style-type: none"> • Travel Health Service (including vaccinations) • Shingles Vaccine • Private Men’s Health treatment • Private Skincare treatment • Private Women’s Health Treatment 	(a) Identity. (b) Contact details (c) Health records necessary for providing you with the health care support you have requested
Tympa	Provision of ear health services, including ear wax removal via micro suction.	(a) Identity. (b) Contact details (c) Health records necessary for providing you with the health care support
PocDoc	Providing the Healthy Heart Check. Our point of care test to calculate your cholesterol levels and risk of having a heart attack or stroke within the next 10 years.	(a) Identity. (b) Contact details (c) Health records necessary for providing you with the health care support
Messaging Service Provider	To send you messages about your prescriptions. We will only use this service when you have opted-in for it.	Name and Contact details

Cegedim	Our patient medical record used for the labelling and dispensing of both private and NHS prescriptions, as well as recording NHS healthcare service consultations and medication supplies, including but not limited to: New Medicine Service, Hypertension Case Finding Service and Pharmacy First.	(a) Identity. (b) Contact details (c) Health records necessary for providing you with the health care support
Pharmsmart	Our regulatory recording platform for supplies of any controlled drugs, Pharmacist logs, and in the unfortunate event of any incidents, the recording of such.	(a) Identity. (b) Contact details (c) Health records necessary for providing you with the health care support
PharmOutcomes	Utilised for COVID vaccine consultation recording, as well as any locally commissioned services by the local NHS bodies.	(a) Identity. (b) Contact details (c) Health records necessary for providing you with the health care support
NHS	We share information with NHS bodies to fulfil our legal obligations as a provider of healthcare service, e.g: claiming payment for provided services. In some instances, we may need to notify your GP of any service provision and/or medication supply made. When communicating with your GP electronically, we'll only pass your personal information to the NHS using an NHS validated secure method of data transfer.	(a) Identity. (b) Contact details (c) Health records necessary for providing you with the health care support
Centred Solutions and Cegedim	Hub and Spoke Software and Central Fill Dispensing of patients' prescriptions. To fulfil or dispense repeat prescriptions by a centralised automated process.	(a) Identity. (b) Contact details (c) Prescription data such as medicine, strength, form, quantity and medicine direction

In addition, we may also share your contact details with our suppliers for home delivery services (which may include your delivery instructions), messaging service providers (if you have opt-in for the service), and other service providers to fulfil our care obligations to you.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by *contacting us* at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us because of a product/service purchase, product/service experience or other transactions.

We also comply with the NHS Code of Practice on Confidential Information and pharmacists have an obligation under their professional standards to keep records about you confidential, secure, and accurate.

You may choose to opt out of the NHS using your data for planning and research purposes – details are obtained by visiting the nhs.uk/yournhsdatamatters website portal; using the NHS App; or writing by post using the

instructions at the weblink above; or by calling the NHS Digital contact centre - 0300 303 5678 (open workdays Monday-Friday, 9am-5pm).

Change of purpose

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the UK\EU so their processing of your personal data will involve a transfer of data outside the UK\EU.

Whenever we transfer your personal data out of the UK\EU, we ensure an adequate protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please *contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

5. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, partners, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. DATA RETENTION

How long will you use my personal data for?

We hold your information for as long as advised by the NHS and\ or based on our data retention policy. You have a right to a copy of the information we hold about you, generally without charge. You may seek to correct any inaccurate information.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

7. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- (A) **Request access to your personal data.**
- (B) **Request correction of your personal data.**
- (C) **Object to processing of your personal data.**

- (D) **Request restriction of processing your personal data.**
- (E) **Request transfer of your personal data.**
- (F) **Right to withdraw consent**, if we have relied on your consent to process your personal data
- (G) **Right to Erasure** - Please note, there are exemptions to data erasure requests to ensure continue care and support for your wellbeing and in line with NHS regulatory guidelines and purposes. We will treat the request on a case-by-case basis, when we receive it.

The right to erasure only applies in certain circumstances. Relevant exceptions include processing data that is for:

- ✓ **Medical diagnosis**
- ✓ **The provision of health or social care**
- ✓ **The management of health or social care systems or services**

There are various legal and medical requirements about retention periods for patient data. Standard NHS data retention policy is to keep GP records for at least ten years after death.

If you wish to exercise any of the rights set out above, please *contact us using the details provided in Section 8*.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. Contact Us

If you would like to contact us with any queries or comments, please send an email to dataprotection@lincolnshire.coop or send a letter to Lincolnshire Co-op, 15-23 Tentercroft Street, Lincoln, LN5 7DB.