ALTERI CARE

Privacy Notice for Patients and Service Users

How we use your personal information when you use the Alteri Care digital health platform

This privacy notice explains what personal information Alteri Care collects and processes when you use the Alteri Care Platform as part of your NHS care. Please read it carefully. If you have any questions, contact us using the details below.

Our Contact Details

Alteri Care is the data processor for the Alteri Care Platform. Your NHS care provider (for example, Guy's and St Thomas' NHS Foundation Trust) is the data controller — they decide why and how your personal information is used. Alteri Care processes your information on their behalf.

Name: Alteri Care
Address: Engelbrektsgatan 10, 211 33 Malmö, Sweden
Email: info@altericare.se
Website: altericare.se

Data Protection Officer

Name: Michael Rosenlind
Email: Michael.rosenlind@altericare.se
You can contact our Data Protection Officer with any queries or concerns about how we use your personal information.

Your NHS Care Provider (Data Controller)

The NHS organisation providing your care is the data controller for your patient information. Their contact details and privacy notice will be provided to you separately by your care provider. Common examples include:

- Guy's and St Thomas' NHS Foundation Trust
- [Other NHS organisation names to be inserted as applicable]

If you are unsure who your data controller is, contact your care provider directly.

How Do We Get Your Information and Why Do We Have It?

The personal information we process is provided in the following ways:

Directly from you:

- You have provided information to receive care, including completing digital triage and health questionnaires before a clinical appointment
- You have entered your own health information, symptoms, or responses to monitoring questions through the platform
- You have registered an account on the platform to access your care
- You have participated in a video consultation with your clinical team
- You have sent or received messages to or from your care team through the platform

From your NHS care provider:

- Your care team has created or updated clinical records about your care, diagnoses, treatment plans, or appointments
- Your care team has entered information about your health history as part of managing your care

What Information Do We Collect?

Personal Information

We collect and process the following personal information:

- Your name and date of birth
- Your contact details, including email address and telephone number
- Your NHS number (where provided by your NHS care provider)
- Your account login credentials (email address used to log in)
- Records of your activity on the platform, including messages sent and received, documents shared, and consultations attended
- System audit records showing who has accessed your records and when

Special Category (Sensitive) Health Information

> Health and care information is classified as ‘special category data’ under UK GDPR and receives the highest level of legal protection. We treat it with the utmost care.

We process the following special category data as part of delivering your care:

- Data concerning your physical health, including medical history, diagnoses, symptoms, and treatment information
- Data concerning your mental health, where relevant to your care
- Patient-reported outcome measures and self-assessment responses you complete through the platform
- Clinical notes and care plans created by your clinical team
- Information shared during video consultations (note: video consultations are not recorded by default)

Who Do We Share Your Information With?

We may share your information with the following:

Within your care:

- Members of your NHS clinical team who are involved in your care and have been authorised to access your records
- Your NHS care provider organisation as the data controller

Technical sub-processors (organisations that help us operate the platform):

- GleSYS — cloud hosting and server infrastructure (Sweden)
- MariaDB — database software used to store your records (EU/EEA)
- Vonage — video streaming for video consultations (USA)
- Best sms AB — SMS notification delivery (Sweden)
- Mandrill (Mailchimp) — email notification delivery (USA)

All sub-processors are required by contract to process your data only on our instructions and to maintain appropriate security measures.

We are also legally required to share information in certain circumstances, including:

- When required by a court order or public inquiry
- When required to protect children or vulnerable adults
- Where a serious crime has been committed or where there is a serious risk to public safety
- When required by NHS England for national IT and data services

Is Your Information Transferred Outside the UK?

Your information is stored on servers operated by GleSYS in Sweden. Sweden is a member of the European Economic Area (EEA), and the UK has recognised EEA countries as providing adequate data protection under UK GDPR. This means your data is protected to the same standard as it would be in the UK.

Some of our sub-processors are based in the United States (Vonage and Mandrill). Where data is transferred to the USA as part of delivering platform services (for example, during a video consultation or email notification), appropriate transfer safeguards are in place in compliance with UK GDPR international transfer requirements.

Your data is only accessible to authorised Alteri Care staff and the technical support staff of our sub-processors, who are bound by strict contractual obligations to protect your information.

What Is Our Lawful Basis for Using Your Information?

Personal Information

The lawful basis under UK GDPR Article 6 for processing your personal information is:

- Article 6(1)(e) — processing is necessary for the performance of a task carried out in the public interest, namely the provision of NHS healthcare by your care provider
- Article 6(1)(b) — processing is necessary for the performance of a contract, namely the contract between Alteri Care and your NHS care provider for the provision of the platform

Special Category Health Information

The lawful basis under UK GDPR Article 9 for processing your health information is:

- Article 9(2)(h) — processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services

Common Law Duty of Confidentiality

In our use of your health and care information, we satisfy the common law duty of confidentiality because your consent is implied through your use of the platform to receive care, and because we are processing information solely for the purpose of supporting the health care you have chosen to receive.

How Do We Store Your Information?

Your information is securely stored on encrypted servers operated by GleSYS in Sweden. We apply the following security measures to protect your information:

- Encryption of all data in transit using TLS 1.2 or above
- Encryption of all data at rest
- Role-based access controls ensuring only authorised clinical and administrative staff can access your records
- Multi-factor authentication (MFA) required for all staff accounts
- Full audit logging of all access to patient records
- Daily automated backups with regular restoration testing

Your information is retained for the periods specified in the NHS Records Management Code of Practice 2021, which generally requires patient records to be retained for a minimum of 8 years from the date of last entry (or longer for certain categories). We also comply with the Swedish Patient Data Act (Patientdatalagen) retention requirement of 10 years.

At the end of the applicable retention period, your information will be securely deleted from our systems in accordance with our data retention policy and any contractual obligations with your NHS care provider.

What Are Your Data Protection Rights?

Under UK GDPR, you have the following rights in relation to your personal information. To exercise any of these rights, please contact your NHS care provider in the first instance, as they are the data controller for your patient records. You may also contact Alteri Care directly using the contact details above.

Right of access

You have the right to ask for a copy of the personal information we hold about you. This is known as a Subject Access Request.

Right to rectification

You have the right to ask us to correct personal information you believe is inaccurate, or to complete information you believe is incomplete.

Right to erasure

You have the right to ask us to delete your personal information in certain circumstances. Please note that this right may be limited by legal retention obligations applicable to health records.

Right to restriction of processing

You have the right to ask us to restrict how we process your personal information in certain circumstances.

Right to object to processing

You have the right to object to our processing of your personal information in certain circumstances.

Right to data portability

You have the right to ask us to transfer your personal information to another organisation or to you directly, in certain circumstances.

You are not required to pay any charge for exercising your rights. We have one month to respond to your request. To make a request, please contact us at: [INSERT EMAIL ADDRESS OR POSTAL ADDRESS].

Automated Decision Making

The Alteri Care Platform does not use your personal information to make automated decisions without human involvement that have a significant impact on you. All clinical decisions are made by your qualified clinical team on the basis of information available to them through the platform.

The platform may use your information to present your care team with a summary of your health history or questionnaire responses. This is to assist, not replace, clinical judgement.

National Data Opt-Out

We are not currently using confidential patient information for planning or research purposes beyond your individual care. The national data opt-out does not apply to the processing described in this privacy notice.

If this changes in the future, we will update this privacy notice and apply the national data opt-out in accordance with NHS England requirements. You can find out more about the national data opt-out at www.nhs.uk/your-nhs-data-matters.

How Do I Raise a Concern or Complain?

If you have any concerns about how we use your personal information, please contact us in the first instance:

Email: info@altericare.se
Post: Data Protection Officer, Alteri Care, Engelbrektsgatan 10, 211 33 Malmö, Sweden

If you are not satisfied with our response, you have the right to complain to the UK Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113

Website: https://www.ico.org.uk

You also have the right to complain to the Swedish data protection authority (Integritetsskyddsmyndigheten, IMY) if you believe your rights under EU GDPR have been infringed:

Integritetsskyddsmyndigheten (IMY)

Box 8114, 104 20 Stockholm, Sweden

Website: https://www.imy.se

Date of Last Review

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Document owner: Michael Rosenlind, Data Protection Officer, Alteri Care

> This privacy notice will be reviewed and updated whenever there is a significant change to how we process your personal information, including changes to the platform's functionality, new NHS deployments, or changes to applicable law.