

Express Diagnostics Privacy Notice



Who we are.

Express Diagnostics (The Company) is registered with the Information Commissioners Office. Registration Reference: Z5672122

Express Diagnostics Ltd is part of Inuvi Group Ltd which consists of Inuvi Health Ltd, Inuvi Diagnostics Ltd and Physiological Measurements Ltd

Some services are shared between Group companies and, where this is the case, we will tell you about this in the section below called 'Which parts of our group do we share information with and why?'

At Express Diagnostics, we take your privacy and data protection seriously. As a trusted provider of cardiology, respiratory, and audiology diagnostic services to the National Health Service (NHS), as well as offering clinical trial services involving ECG analysis, we are committed to safeguarding the personal information you entrust to us. We strive to be transparent in our data practices, ensuring that you have control over your data and understand how it is utilised to deliver our exceptional services. Your trust is of utmost importance to us, and we are dedicated to maintaining the highest standards of data privacy and security throughout our interactions with you.

Personal data in this policy refers to any data that has the potential to identify you as an individual.

Express Diagnostics acts as the data controller for the personal information we collect and process.

You can contact us at -

Address:

6 Research Way,
Plymouth Science Park,
Plymouth,
Devon,
PL6 8BU

Email:

Enquiries@Expressdiagnostics.co.uk

Phone:

01752 201144

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When you visit our Clinic.

We collect and process your personal information when you visit for Cardiology, Respiratory or Audiology services, regardless of whether you are referred by a GP or choose to self-refer.

This information includes your contact details, relevant medical details, and any relevant notes from your appointments. We use this information solely for the purposes of providing you with safe and effective healthcare, communicating with you regarding your care, and ensuring accurate record-keeping. We treat your information with the utmost confidentiality and only share it with authorised healthcare professionals directly involved in your care, or as required by law. You have the right to access, modify, or request deletion of your personal information in accordance with data protection regulations. Please refer to the "Your Rights" section for further details.

When you visit our website

We use a cookies tool on our website to gain consent for the optional cookies we use*.

Cookies that are necessary for functionality, security and accessibility are set and are not deleted by the tool.

You can read more about how we use cookies, and how to change your cookies preferences, on our Cookies page.

*Strictly necessary cookies do not require consent to be installed

When you make an enquiry

Whether you contact us via phone, email, or our website, we may collect your personal information such as your name, contact details, and the nature of your enquiry. This information is used solely for the purpose of responding to your enquiry and providing you with relevant information or assistance. We may also aggregate anonymised data from enquiries to improve our services or understand client needs better.

We do not share your enquiry information with third parties unless it is necessary to fulfil your request or respond to a legal obligation. For example, if you inquire about a specific service offered by a partner organisation, we may share your contact details with them with your consent.

We may document any conversation as part of our record keeping process.

When we analyse your recordings as part of a contract

We process Electrocardiogram (ECG) recordings in accordance with contractual agreements with NHS providers and private healthcare organisations. These recordings are essential for assisting with diagnosis. We take patient privacy seriously and adhere to strict data protection regulations. All information is handled securely and confidentially with appropriate anonymisation or pseudonymisation measures in place. We never share patient data with

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unauthorised third parties without explicit consent or unless legally required. For further details about our data handling practices and your individual rights, please refer to the "Your Rights" section or contact our Data Protection Officer.

Using your data for training purposes.

We understand the importance of continuous improvement and the need for ongoing training to enhance our service delivery. To achieve this, we may use personal data collected from our Patients for training purposes. This involves utilising anonymised and aggregated data to create realistic training scenarios for both new and current staff. The use of personal data in this context is strictly limited to internal training activities and is essential to ensure that our team is well-equipped with the necessary skills and knowledge to provide you with the best possible service.

If you are an Employee

Staff members can view the Employee Privacy Notice via the Company document management system.

Which parts of the Inuvi Group do we share information with and why?

All members of the Inuvi Group Limited may provide services to you. Sometimes we might provide the same type of services, and where this is the case, we will share personal information about you between individuals and in our systems to ensure we can deliver the service more efficiently. We might also share services such as IT, finance, invoicing, privacy and data protection, complaints, and marketing.

The table below details the different services where we share information with other members of the Group.

Service	Personal data shared	Group Member
IT Services	Express Diagnostics IT systems and services containing all your personal data	Inuvi Group IT
Financial services	Information relating to your purchases.	Express Diagnostics
Governance	Patient Complaints; Data protection requests; Data breach information;	Physiological Measurements Ltd ; Express Diagnostics
Outpatient Services	Patient demographics; Patient health information for the purpose of patient care.	Physiological Measurements Ltd; Express Diagnostics

Click on the company name to find out more about how they use your personal information.

Data processing by third parties.

At Express Diagnostics, we may need to share some of your personal information with third parties to support the services we provide related to your care. We only share your data for purposes directly relevant to carrying out our contractual duties and normal business activities.

This includes:

- Business Partners, Suppliers, and Sub-contractors: We share your information with select companies we work with that assist us in fulfilling our agreements with you and managing our operations.
- IT Systems Support and Hosting Providers: We share your data with specific technology partners that help us securely store and process your information.
- Healthcare Providers: We share relevant information with your other healthcare providers to assist in coordinating your care and treatment.
- Delivery Companies: We share necessary information with delivery partners to ensure products or services reach you appropriately.

We take your privacy seriously, and we ensure that these specific third parties are bound by strict contractual terms to protect your information. We only share the minimum data necessary for them to perform their duties. If you have any questions or concerns about how we handle your personal data, please feel free to contact us. Your trust is essential to us, and we are dedicated to keeping your information safe and secure.

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place, such as Standard Contract Clauses or Adequacy decision.

How long we keep information

Express Diagnostics keeps health data for no longer than necessary to achieve the purpose and in line with the NHS Records Management Code of Practice:

[NHSE Records Management CoP 2023](#)

Your Rights

You have certain rights regarding your personal data as outlined in the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018. These include:

- The right to request access to the data we hold about you
- The right to correct inaccurate or incomplete data
- The right to delete your data in certain circumstances
- The right to restrict processing of your data
- The right to object to processing based on legitimate interests
- The right to data portability
- The right to withdraw consent

To make a request regarding any of these rights, please email DPO@Expressdiagnostics.co.uk. We will respond to all valid requests in compliance with data protection regulations.

Lawful basis for processing

We process personal data in accordance with various lawful bases depending on the specific purpose and context. These include:

- **Consent:** We may seek your explicit consent for processing data for marketing communications and research purposes. You have the right to withdraw your consent at any time for these activities.
- **Legitimate Interests:** We may process data for our legitimate interests in fraud prevention, security, improving our services, and other business operations. However, we always balance these interests against individual privacy rights.
- **Contract:** We process data necessary to fulfil our contractual obligations with patients, healthcare providers, employees, and other partners. This includes services commissioned by local health authorities. Failure to provide necessary personal data will result in Express Diagnostics being unable to provide the service.
- **Legally Required:** We may be obligated to process and share data in certain situations as required under UK data protection law, such as court orders or as part of a police investigation. Data provided will be data that has already been collected as part of a previous processing activity.

If you have any questions about our lawful bases for processing, please contact our Data Protection Officer for more details. We are committed to ensuring all data processing adheres to relevant regulations and occurs fairly and transparently.

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Purpose	Types of data	Lawful basis	Retention Period
Clinical diagnostics and treatment	Patient identifiers (name, DOB, NHS number) ECG, Holter, audiology, lung function results Medical history and symptoms	GDPR Article 6(1)(e): Task carried out in the public interest or official authority (for NHS services) GDPR Article 9(2)(h): Provision of health or social care	8 Years
Security	CCTV Images	GDPR Article 6(1)(f): Legitimate interests (protecting staff, patients, and property)	14 Days
Service administration and appointment scheduling	Contact details (address, phone, email) Appointment history Reason for referral (Clinical Indications)	GDPR Article 6(1)(b): Necessary for performance of a contract (for private services) Article 6(1)(e) performance of a task carried out in the public interest (for NHS services) Article 9(2)(h) – provision of health or social care under an NHS-commissioned service.	8 Years
Compliance with legal obligations (e.g. audits, reporting)	Clinical records Service usage data	GDPR Article 6(1)(c): Legal obligation - Article 9(2)(i): Public interest in public health	8 Years
B2B Marketing	Forename Surname Work Email address Organisation Job Title Contact Number	GDPR Article 6(1)(f): Legitimate interests	5 Years

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Purpose	Types of data	Lawful basis	Retention Period
Responding to an Enquiry	Email address Forename Surname Contact number Any personal details provided as part of your enquiry	GDPR Article 6(1)(a): Consent	6 Years

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National data opt-out

We comply with England's national data opt-out. To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters.

Our Data Protection Officer Contact Details

We have outsourced a Data Protection Officer (DPO) to advise and guide us on data protection matters. Our DPO contact details are the following:

Kaleidoscope Consultants LTD

dpo.inuvigroup@kdpc.uk

+44(0)20 3637 1111 ext. 213

Making a Complaint to the ICO

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you have concerns about how we are handling your personal data or complying with data protection regulations.

To submit a complaint to the ICO, please visit their website at <https://ico.org.uk/make-a-complaint/> and complete the online form.

You will need to provide details about:

- Your relationship with our company (e.g. customer, employee, etc.)
- The specifics of your complaint and concerns about our data processing activities
- Any steps you have already taken to resolve the issue directly with us

The ICO will assess your complaint and make a determination on whether we have failed to comply with applicable data protection laws.

You can also contact the ICO for general data protection guidance or advice at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113