



Spirit Access Privacy Notice



Spirit Access provides consultancy and advisory services to pharmaceutical and medical technology companies to add value for the NHS, industry and most importantly patients. It analyses patient pathways and develops models and simulations of disease areas so that the NHS can understand the impact of making change. It uses digital technology solutions and helps implement service improvements.

As part of the services performed by Spirit Access it analyses non-sensitive, non-identifiable pseudonymised patient level data. As a business there is a limited amount of personal data processed. This data is around employee information and business to business marketing.

What information is being collected by Spirit Access?

- General contact information: Name, Address, Telephone number, Email address, Job Title, Area of responsibility and Past employment information.

How is it collected?

- From other Healthcare professionals
- Via LinkedIn
- The Internet
- Local Health Publications
- The Media
- From other Spirit colleagues

Why is it being collected?

This information is being collected in order for legitimate interest of the Data Controller.

Information is collected for

The information is collected for direct marketing purposes and day to day business management.

How will it be used?

- To contact NHS and other Healthcare providers to promote our pathway solutions
- To contract pharmaceutical businesses to promote our services
- To produce marketing information

Who will it be shared with?

- Spirit Colleagues
- Healthcare commissioners
- Healthcare professionals
- Academics on joint pieces of work
- Media

Where will the data be stored?

All data collect will be stored within the United States of America. The third-party company is sign up to the Privacy Shield, which is a mechanism to ensure non-EU Companies comply with Data Protection requirements when transferring personal data from Europe.

Automated decisions

No automated decision making is used with the data collected.

Your rights as a data subject

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require the organisation to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of your data where Spirit is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact lisa.wakeford@spirit-healthcare.co.uk

Accessing your information

If you would like to access the information we hold on you please write to Lisa Wakeford. lisa.wakeford@spirit-healthcare.co.uk your request will be dealt with in accordance with the GDPR guidance.

Opt out of promotional material

If you would like to change your mail preferences and/or opt out from our promotional material, we will be sorry to see you go, but to do so, could you please email SpiritAccess.Enquiries@spirit-healthcare.co.uk

The Data Protection Officer (DPO)

Spirit have appointed a DPO. This is our Head of Governance – Lisa Wakeford. The role of the DPO is to assist data ‘Controllers’ and ‘Processors’ to comply with data protection law and avoid the risks that organisations face when processing personal data.

The Data Controller

The Data Controller responsible for keeping your information confidential is:

Spirit Access, Spirit House,
Saffron Way,
Leicester, LE2 6UP

Telephone: 08008815423

www.spirit-healthcare.co.uk

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

Information Commissioner

The Data Protection Act 2018 requires organisations to lodge a notification with the Information Commissioner to describe the purposes for which they process personal information. These details are publicly available in the Register of Data Controllers. Our Registration number is: **Z1816219**

Further information can be obtained from:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, SK9 5AF
Telephone: 0303 123 1113

www.ico.org.uk