

# Spirit Digital Privacy Notice

Spirit Digital works with its healthcare customers, including Commissioners and Clinicians, to implement forward-thinking care models that extend care access, improve quality and lower the cost of care. Through these proven models, Spirit Digital helps enable healthcare systems to extend high quality care to patients throughout their journey across the care spectrum.

Our product is called Clinitouch Vie, this is a digital health service which helps people to stay at home supporting them in better self-management and to receive the right interventions at the right time. As well as empowering individuals in understanding their condition, it allows for remote clinical monitoring of medical conditions by healthcare professionals providing an early notification of deterioration. This allows clinicians to review patients as regularly as they like without making more house visits, improving quality of life and avoiding hospital admissions.

## What information is being collected by Spirit Digital?

- General contact information: Name, Address, Telephone number, Email address,
- Job Title and Area of responsibility for NHS teams and staff
- Visual images (Video recordings)
- Verbal comments (audio recordings)

## How is it collected?

### NHS Teams/staff

- From other Healthcare professionals
- Web based resources
- Public domain resources
- Inter business resources

### Services users

- Service user themselves
- Clinician involved in service user's direct patient care

## Why is it being collected?

This information is being collected in order for legitimate interest of the Data Controller. In addition to this, under some specific circumstances consent is also used/obtained – this would be for the recording of images and audio for marketing purposes.

## Information is collected for

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

## **How will it be used?**

- To contact NHS and other Healthcare providers to promote our digital health solution
- To produce promotional information

## **Who will it be shared with?**

- Inter-business colleagues
- Healthcare commissioners
- Academics on joint pieces of work
- Media

## **Where will the data be stored?**

All data collect will be stored within the United Kingdom.

## **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](mailto: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](mailto: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 [digital@spirit-healthcare.co.uk](mailto:digital@spirit-healthcare.co.uk) or call 0800 881 5423.

### **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 Digital, Spirit House,  
Saffron Way,  
Leicester, LE2 6UP  
Telephone: 08008815423

[www.spirit-healthcare.co.uk](http://www.spirit-healthcare.co.uk)

**The Data Protection Officer is Lisa Wakeford.**

### **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. To search the register, go to [www.ico.org.uk](http://www.ico.org.uk)

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](http://www.ico.org.uk)