

# RESEARCH PRIVACY NOTICE

## Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR), which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

**1 –** The British College of Osteopathic Medicine, based at Frazer House, 6 Netherhall Gardens, London NW3 5RR, which hereafter for the purposes of this Privacy Notice will be referred to as 'BCOM' or 'the College', is pleased to provide the following information:

## **2 - Who we are**

BCOM is a specialist osteopathic education institution, provided undergraduate and postgraduate osteopathic education, and outpatient osteopathic care.

## **3 - Personal Data**

The information published here applies to the use of your personal information by BCOM and its research partners.

If you have joined a specific research study, you have already been told if you are participating in a research study that BCOM is running jointly with other organisations, such as other universities or hospitals. You have also already been told about the types of personal information we will use in connection with the specific research study or project you are participating in and (where applicable) its sources, any data sharing or international transfer arrangements, and any automated decision-making that affects you.

If you are a patient of the BCOM clinic, your personal data may be used in a pseudonymised format for BCOM research projects.

## **4 - Legal basis for processing any personal data**

In the majority of cases, we will have asked for your consent to use your personal information for research purposes. If we asked for your consent, you can withdraw this at any time; you should have already been told how to do this but if not, or if you are in doubt, please use the contact details below. Please note that your consent to use your personal information (which we rarely request) is separate from your ethical consent to participate in a particular research study (which we usually request for relevant types of research).

You are not legally or contractually obliged to supply us with your personal information for research purposes.

Data collected from NHS patients in the BCOM Clinic (pseudonymised patient outcome and satisfaction data) will be processed under the legal basis of public task, as part of our NHS contractual obligations.

## **5 – Disclosure**

As described above, your personal information is shared with staff or students engaged in relevant Research activities at the College, as required. In addition, it may be shared as permitted or required by law, on a considered and confidential basis, with external organisations.

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Other than as set out above, we will not normally publish or disclose any personal information about you to other external enquirers or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

## 8 - Retention Policy

Research data will normally be preserved and accessible for ten years (either as paper form or electronic), but for projects of clinical, funded by external bodies who have a different policy, or major social, environmental or heritage importance for 20 years or longer, at our discretion.

## 9 - Data storage

All data is held in the United Kingdom.

## 10 - Your rights as a data subject

At any point whilst BCOM are in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access –you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – under certain circumstances, you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – under certain circumstances, you have the right to have the data we hold about you transferred to another organisation.
- Right to object – under certain circumstances, you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that BCOM refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request BCOM can confirm what information it holds about you and how it is processed.

## 11 - You can request the following information:

- Identity and the contact details of the person or organisation (BCOM) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of BCOM and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

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## **12 - To access what personal data is held, identification will be required**

BCOM will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Osteopaths is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to [dpo@bcom.ac.uk](mailto:dpo@bcom.ac.uk) or by phoning +44 (0) 207 435 6464 or writing to us at the address further below.

## **13 Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by BCOM you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO.

The details for each of these contacts are:

Data Protection Officer Telephone 0207 435 6464 or email: [dpo@bcom.ac.uk](mailto:dpo@bcom.ac.uk)

## **ICO**

Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone +44 (0) 303 123 1113 or email:

<https://ico.org.uk/global/contact-us/email/>