### **Privacy Policy**

UK NEQAS for Blood Coagulation (UK NEQAS BC) is committed to maintaining the trust and confidence of our participants and users of our services. We will only use your data to provide the services you have subscribed to and will not sell on or transfer your private contact details to other companies. Outlined below in our privacy policy is detailed information on how we collect information, how we use it, the limited conditions under which we may disclose it to others, how we keep it secure and your rights.

# 1. Information that we collect from you

The personal data we collect will be the information that you provide when subscribing to our external quality assessment (EQA)/proficiency testing (PT) services and will include your name, address (usually of your place of employment), phone numbers and email address. We will also request details of your finance department for invoicing purposes and may also hold other details about you from any communication that you have with us. We may also collect information from you about your working practices, to enable us to ensure that you are receiving the appropriate provision of services for which you have subscribed.

The website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal information you submit or are collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

Additionally, when someone visits <a href="www.ukneqasbc.org">www.ukneqasbc.org</a> we use a third party service, Google Analytics, to collect standard internet log information such as details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

# 2. Basis for processing and use of your data

To enable us to provide an efficient service there are certain pieces of information that we need to collect. If you do not provide this information then unfortunately you will not be able to receive our EQA services. By completing the on-line registration form you automatically consent to allowing us to access to the information you provide. If you do not wish us to use this information then please do not use/complete the registration process, but be aware that we will not be able to provide the services you wish to use. The following provides the information we collect and why.

2.1 Whether you are already a participant or becoming a participant of UK NEQAS BC, the basis for our processing of your personal data will be to enter into and perform the contract between you/your centre and ourselves. This will include:

- Billing and providing up to date information on methodological issues.
- For "service administration purposes", which means that UKNEQAS BC may contact you for reasons related to the service you have signed up for (e.g. to provide you with password reminders);
- To contact you about a submission you have made to the websites, including any content you provide
- To personalise the way in which the www.ukneqasbc.org website and the Certus system content is presented to you;
- IP addresses may be used to identify the location of users and to block disruptive use:
- To analyse and improve the services offered on www.ukneqasbc.org e.g. to provide you with the most user-friendly navigation experience.
- 2.2 We may from time to time send you information about matters that we believe will be of interest to you. The basis for our processing of your personal data will be legitimate interest.
- 3. Disclosure of your information
- 3.1 We may employ other companies to provide services for us. These companies will have access to the personal information needed to perform their functions and not for any other purpose. Those functions may include invoicing, recovering debts, tracing debtors and the development of information technology solutions to allow the improved provision of EQA/PT services.
- 3.2 UK NEQAS BC has a statutory requirement to report all United Kingdom Persistently Outwith Consensus (UKPOC) laboratories to the National Quality Assurance Advisory Panel(s) (NQAAP), as such in any instance of UKPOC we are required to disclose information about you and your laboratory. Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.
- 3.3 If you post or send offensive, inappropriate or objectionable content anywhere within the www.ukneqasbc.org website, or otherwise engage in any disruptive behaviour on www.ukneqasbc.org, UK NEQAS BC may use your personal information to stop such behaviour. Where UK NEQAS BC believes that you are or may be in breach of any of the laws of England or Wales (e.g. because content you have posted may be defamatory), UK NEQAS BC may use your personal information to inform relevant third parties such as your employer, Internet provider or law enforcement agencies about the content and your behaviour.
- 4. Security and data retention
- 4.1 We employ appropriate security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.
- 4.2 We will retain your information for a reasonable period or as long as the law requires, taking into account the nature of the information and purpose for which it has been obtained and is used or held.

### 5. Changes to our privacy statement

Any changes to our privacy statement in the future will be posted to our website and, where appropriate, provided through e-mail notification.

# 6. Your rights

- 6.1 You have the right to access information held about you, the right to request that this information be deleted or corrected (as appropriate), and the way it is processed.
- 6.2 The right to erasure does not apply to health and social care information; this need to be retained for care and medico-legal purposes. Any request to erasure or to be forgotten will be assessed on a case by case basis using the precedent of UK NEQAS BC's developing experience of the new legislation, along with relevant case law.
- 6.3 You may request that UK NEQAS BC's hold only sufficient Personal Data about you, but not process it any further. Any request for restriction of processing will be assessed on a case by case basis using the precedent of the UK NEQAS BC's developing experience of the new legislation, along with relevant case law.
- 6.4 You can exercise these rights at any time by using the UK NEQAS BC website to update your own details and by emailing neqas@coageqa.org.uk
- 6.5 Questions, comments, concerns and requests regarding this privacy statement or our collection or use of your information are welcomed and should be addressed to neqas@coageqa.org.uk
- 6.6 UK NEQAS BC is operated by Sheffield Teaching Hospitals NHS Foundation Trust, whose Data Protection Officer (DPO) can be contacted by emailing sth.gdpr@nhs.net.

#### 7. Use of cookies

- 7.1 Like many other websites, the UK NEQAS BC website (www.ukneqasbc.org) uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.
- 7.2 It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website, and could mean that you will not be able to access some of our services.

#### 8. How to Complain

- 8.1 The Information Commissioner's Office is the UK's supervisory authority for privacy and data protection matters for more information visit <a href="https://www.ico.org.uk/concerns">www.ico.org.uk/concerns</a>.
- 8.2 If you are not satisfied with our response or believe that we are not processing your personal data in accordance with the law you can complain to the ICO at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

E-mail: casework@ico.org.uk

Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

Policy updated January 2022