

## EASTERN AHSN & HEALTH INNOVATION EXCHANGE EAST PRIVACY NOTICE

Eastern Academic Health Science Network (Eastern AHSN) is one of 15 AHSNs across England, established to play a unique role in enhancing the health and wealth of our nation. By bringing together industry, academia, voluntary organisations and the NHS, AHSNs close the gap between innovation and patient benefit. Click to read more about the [AHSN Network](#). We are committed to the sharing and spread of knowledge through newsletters and events. For us to provide these services to you, we will need to store your data when you register your interest or attendance.

As part of the innovation and adoption service delivery, Eastern AHSN also runs the Health Innovation Exchange East (Health InnEx East) platform (<http://www.innovationexchangeeast.org>). This is an interactive innovation health exchange for anyone to share their innovations and ideas, build groups and networks and make contact with people whose innovations could improve healthcare delivery in the Eastern region.

The information we will collect on you will depend on the services we provide you (these being newsletters, events or Health InnEx East platform). A summary of the data we collect is provided in table 1 below. Transparency is a key aim of all of our work, so we want to ensure you understand what we do with the data you supply to us and why. In this privacy notice, we'll provide details on the following:

- what information we collect from you
- how we have collected it
- what we use this information for
- our legal basis for using this data
- where we store the data
- your rights and how to withdraw your consent
- how to raise any questions, and if necessary, where to lodge a complaint

***Health InnEx East platform Users: Please note that this document relates to your personal data i.e. the information you supply when registering for the Health InnEx East platform. For information on submissions and innovations, please see the editorial policy available on the Health InnEx East website.***

Please also note that unfortunately, Eastern AHSN cannot accept medical questions via the web that contain patients' personal or confidential medical information. The Health InnEx website is explicit that confidential patient data must not be shared on the platform. By clicking the 'Submit my Idea' button on the website, I hereby confirm that the question(s) I am submitting to Eastern AHSN does not contain any confidential medical information pertaining to either myself or my patients.

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Table 1: Data collection and use summary

Personal Data	Mailings	Events	Health InnEx East platform
E-mail Address	<b>Required</b> to distribute our newsletter	<b>Required</b> to provide updates to the event you have registered to attend and post event follow-up	<b>Required</b> to provide activity updates, newsletter and sector updates
Forename	<b>Optional</b> to clarify our records	<b>Required</b> for check-in at event, printed onto name badges and mailing list, passed to venue for fire safety regulations and post event follow-up	<b>Required</b> for communication between users and identifying submission authors
Surname	<b>Optional</b> to clarify our records	<b>Required</b> for check-in at event, printed onto name badges and mailing list, passed to venue for fire safety regulations and post event follow-up	<b>Required</b> for communication between users and identifying submission authors
Title	N/A	<b>Optional</b> for printing onto name badges at the event (excluding Mr, Miss, Ms or Mrs)	N/A
Job Title	<b>Optional</b> to enable us to send you more relevant communications	<b>Required</b> for printing onto name badges at the event and post event follow-up	<b>Required</b> for communication between users and identifying submission authors
Organisation	<b>Optional</b> to enable us to send you more relevant communications	<b>Required</b> for printing onto name badges at the event and post event follow-up	<b>Required</b> for communication between users and identifying submission authors
Telephone	N/A	<b>Required</b> to contact you if changes to the event occur	<b>Required</b> for communication between innovators submitting ideas
Mobile Phone	N/A	<b>Required</b> to contact you if changes to the event occur	<b>Optional</b> for communication between site users
Sector	<b>Optional</b> to enable us to send you more relevant communications	Optional to enable us to evaluate/monitor event attendance	N/A
Address/Postcode	N/A	Required for post event follow-up	<b>Required</b> for communication between users and identifying submission authors
Department/Division/Faculty	N/A	N/A	<b>Optional</b> for communication between site users
Area of Interest	N/A	N/A	<b>Required</b> for sending news, updates and opportunities specific to your area of Interest
Profile Picture	N/A	N/A	<b>Optional</b> to help you stand out in a crowd
Dietary or access requirements	N/A	<b>Optional</b> so we can accommodate your dietary or access requirements.	N/A

## Our legal basis for using this data

At Eastern AHSN, we have extensively reviewed how we collect, store and process data for compliance with the Data Protection Legislations (UK Data Protection Act 2018 & EU GDPR 2016). We are jointly commissioned by the NHS and Office for Life Sciences and on their behalf, we carry out a public task to facilitate research, development and innovation of healthcare in the region. Therefore, our legal basis is Article 6(1) of the GDPR 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.

Eastern AHSN's core values are to maintain a shared purpose and endeavour across its members and partners centred on the spread of knowledge, encouraging collaboration and sharing innovations. Furthermore, our method is to offer networks where information can be shared, relationships built, successes shared and celebrated and solutions to healthcare challenges identified. Therefore, our communications to you are a key part of achieving our objectives.

Any mailing records we have on you that were gathered before 25 May 2018 will have been obtained through the methods described [below](#). After 25 May 2018, signing up to our mailings through our events and website will require your specific, informed and unambiguous consent. You will have had the opportunity to read through this document when registering your interest.

Finally, when organising an event, we are required to send a list of our attendee names to the event venue to comply with fire safety regulations. In addition, information may be sent to printers purely for the production of event materials, e.g. name badges.

To use Eastern AHSN's innovation exchange, your consent is required when supplying your information to register onto the platform. The Health InnEx East platform's operation is a task in the public interest due to its function as a catalyst for innovation that directly benefits the health and wealth of the Eastern region, therefore we rely on Article 6(1) e of the GDPR as our lawful basis of data processing.

If you submit an innovation to the Health InnEx East platform, we rely on public interest for the further processing of the information you supply. Following submission of an innovation, Eastern AHSN will share your submission details, excluding any information you have provided in the confidential sections of the form, to our regional editorial board – a group of multi-disciplinary professionals to gauge their views on the innovation. You can find their editorial policy on the Health InnX East website. We may also provide contact details you supplied during registration, should interested stakeholders wish to discuss your innovation with you. We would like to name every third party involved during this procedure, but the list is ever changing and subject to your submission. If you have registered on the platform and submitted your innovation onto Health InnEx East platform, this implies that you are seeking collaborators, support or assistance with your project. We therefore rely on our public interest to develop innovations for the region as our means of processing the data you have supplied.

Under GDPR, you have rights to access your information, rectify any errors and restrict the way we use the data we hold on you at any time. For more information, you can review [your rights under GDPR](#).

## Communication and Events

The purpose of Eastern AHSN is to select, encourage, develop and deliver innovation to generate patient benefit and economic growth across our region.

To achieve this, we bring together collaborations between health and care providers, industry, academia, third sector, patients and carers and others in order to deliver the intended outcomes. The communications we distribute and events we organise are key methods of achieving these aims.

### What information we collect from you

The data we collect from you when registering for our newsletter or events are summarised in [Table 1](#). The data we collect is the minimum amount of data necessary to provide you with the services you have signed up to.

### How we have collected it

There are a number of ways in which we may have collected your data. You may have, for example:

- signed up to the newsletter on our website
- registered to attend one of our events
- provided us your details (i.e. business card) in person
- supplied this data to a publicly available source (e.g. your organisation website)
- had some form of historical business/collaboration with us

### What we use this information for

The data we have collected as described above helps us to achieve our organisational aims and is the minimum amount necessary to do so. Detailed information on how we use the data is provided below. A summary is provided in [Table 1](#).

#### Communications and newsletter

We use your name and email address to send you our communications and newsletters to help you:

- Find out the latest updates about our programmes and projects including Innovation Exchanges, events, Patient Safety and resources to support transformation
- Receive occasional updates about local and national funding opportunities
- Be kept informed about other initiatives across England's 15 Academic Health Science Network (AHSNs)
- Be able to access advice and expertise across the pathway of innovation
- Get help, advice, training and top tips on patient and public involvement

Sharing this knowledge across the region and beyond is a key part of our mission and helps you understand the opportunities available to participate in.

#### Events

The data we collect when registering for our events will be utilised for the smooth running of the event. This includes any updates or cancellation of the event, name badges and sign-in sheets for the event day. Your name and dietary requirements (if supplied) will need to be supplied to

the event venue for fire safety and for catering, respectively. The dietary requirements data will be deleted from our records following the event.

If registering by contacting one of us directly over the phone or via email, we will collect the same information as above. If you attend one of our events without prior registration, we will collect this information through our paper-sign in sheets. This information will be manually added onto our Eventbrite records following the event to avoid confusion between our online and paper lists.

We may have photographers or film crews at our event. If so, we will request your consent for photographs during registration. If you do not consent, we'll provide you a badge to communicate this to the photographer. They will avoid photographing you and will obscure your identity post-event if necessary.

### Metrics

We collect data on the number of attendees at our events and new subscribers to our newsletter to monitor our performance and activity.

### Corporate Meetings

If you are involved in any of our corporate meetings e.g. Citizen's Senate or Advisory Panels, we will hold your contact details to inform you of upcoming meetings and any updates you may need to know about. We will need to maintain our records for as long as you are a member. Please refer any enquiries regarding corporate meetings to [enquiries@eahsn.org](mailto:enquiries@eahsn.org)

### Where we store the data

We store your data from our main website on secure NHS servers located in Germany, which is part of the EU and therefore in compliance with the requirement of DP legislations.

We also use EventBrite to deliver our events and newsletter, respectively. Their platforms will hold the data you supply to us as per their privacy notices. Any organisations outside of Europe will be required to meet their national requirements, indicating that their data security meets GDPR criteria.

Our email service is based on the Microsoft Office 365 exchange platform - This is a cloud based solution adhering to mainstream security certifications, including ISO27002. More details can be found here: [https://www.microsoft.com/online/legal/v2/en-us/MOS\\_PTC\\_Security\\_Audit.htm](https://www.microsoft.com/online/legal/v2/en-us/MOS_PTC_Security_Audit.htm)

### Third parties

As described above, event venues require that we provide a list of all registered attendees for fire safety reasons. If you have dietary requirements, we will need to pass this onto the venue and/or their third-party catering if applicable. We will not disclose your data to any other third party without your prior consent.

## Health Innovation Exchange East platform

The platform is a pioneering interactive innovation health exchange for anyone to share their innovations and ideas, build groups and networks and make contact with people whose innovations could change healthcare in the Eastern region. Health InnX East is owned by Eastern AHSN and has three main purposes:

1. To push innovations to the NHS that have tangible benefits to patient care delivery ('[Other Innovations](#)')
2. To pull in innovation to specific challenges facing the health and care delivery organisations ([Campaigns](#))
3. To share good practice ([Innovation Warehouse](#))

Health InnEx East relies on communication, collaboration and open sharing. If you are submitting an innovation to a campaign, it is assumed that you are seeking collaborators and assistance with your project. With the exception of the data provided under the confidential sections of the platform which will only be shared internally

*Please note that this document relates to your personal data i.e. the information you supply when registering for the Health InnX East platform.*

### What information we collect from you

The data we collect from you when registering for Innovation Exchange East is summarised in [our data collection and use summary](#). This data is used to construct a profile for you on the Health InnX East platform that will be essential for you to connect and collaborate with users. Any information you use to register should be information you would be happy to be shared with other users on the platform.

### How we have collected it

There are three methods by which we may have collected your personal information on the Health InnX East platform. Firstly, you may have signed up to the Health InnEx East platform or alternatively, you may have spoken to us in person to provide your details to be manually included onto the Health InnX East platform. Thirdly, you may have signed up to the Industry Gateway service. All three methods would require you to agree to our website Terms and Conditions before the information you supplied becomes available.

### What we use this information for

The data we have collected as described above helps us to curate an online space that encourages open discussion, collaboration and innovation. There are several ways the data you provide helps us achieve this and are described below.

#### Profile

If you submit innovations, post comments or upload case studies on the Health InnX East platform which are then published, your details will be visible to the Health InnX East website users and site visitors. Unless you have explicitly opted out of this feature when submitting the relevant forms

We encourage this as an opportunity for networking and discussion. However, there is an opportunity on Health InnEx East for you to state that you do not wish any information to be shared publicly and there is a separate confidential data section which we promise not to share outside Eastern AHSN.

Users may have different access dependent on their role on the website. More information is available within the site's editorial policy.

### Notifications

When registered onto the Health InnX East platform, you may receive emails related to newsletters, events, or other Eastern AHSN activity.

#### *Newsletters and Events*

We use your name and email address to send you the Health InnX East newsletter related to news, updates, opportunities, new campaigns and other useful information.

#### *Eastern AHSN activity*

When viewing a published submission on the Health InnX East website, you can subscribe to receive updates on any news or activity related to that submission. When you post a comment, you will receive an email notification of any responses from other users

If you do not wish to receive any emails, please email us at [enquiries@eahsn.org](mailto:enquiries@eahsn.org) and we will remove your email from the database.

### Where we store the data

All Health InnEx East data is stored within secure servers in the Republic of Ireland, which is part of the EU and therefore in compliance with the requirement of DP legislations.

## Third parties

Health InnX East activity is managed by Eastern AHSN, who acts as the site administrators and may have access to your data to carry out activity essential to Health InnEx East's function including moderation of all submissions. The site is hosted and run by 27 Partners Limited.

[As described above](#), Eastern AHSN, will circulate details of your submission to third parties in order to gauge interest from local stakeholders. This may include contact details you supply for these stakeholders to get in touch with you if interested. We would like to name every third party involved during this procedure, but the list is ever changing and we inform different stakeholders subject to your submission. Due to the implied interest in collaboration and information sharing when registering for Health InnEx East and making a submission, we think this aligns with our public interest as described in [our legal basis for using this data](#).

## The Academic Health Science Network

We may also share your personal data with the other members of the Academic Health Science Network for the purposes of improving patient and population health outcomes by translating research into practice and developing and implementing integrated health care services and supporting knowledge exchange networks, sharing best practice and providing for rapid evaluation and early adoption of new innovations.

The other members of the Academic Health Science Network are:

East Midlands Academic Health Science Network  
Health Innovation Manchester  
Health Innovation Network  
Imperial College Health Partners Limited  
Kent Surrey Sussex AHSN Limited  
The Academic Health Science Network for The North East And North Cumbria Limited  
Innovation Agency, Academic Health Science Network for The North West Coast  
Oxford Academic Health Science Network  
South West Peninsula AHSN Limited  
UCL Partners Limited  
Wessex Academic Health Science Network Limited  
West Midlands Academic Health Science Network  
West of England AHSN Limited  
Yorkshire and Humber Partners Academic Health Science Network Limited

We require the other members of the Academic Health Science Network to respect the security of your personal data and to treat it in accordance with the law and therefore all members of the Academic Health Science Network have entered into an agreement to regulate any data sharing between themselves.

## Your rights under GDPR

You have a number of rights under the GDPR and there are as follows:-

### *The right to be informed*

Privacy statements / link to privacy policy is on each page of the website to ensure transparency of data held, and the purpose for which they are used. The privacy statement will make the 'Rights' outlined in this section explicit.

### *The right of access*

Anyone has the right to request a copy of the information held about them as individuals this is explained as part of the privacy policy. Any requests for information must be sent to [enquiries@eahsn.org](mailto:enquiries@eahsn.org). The internal process is for the Data Protection Lead to identify information held on the Company's CRM system, and ask the nominated lead (or Director) of each team to supplement this with any information held at a team level.

### *The right to rectification*

If any data held is incorrect, we will correct this within 2-working days of being notified. Rectification requests must be sent to [enquiries@eahsn.org](mailto:enquiries@eahsn.org). The internal process (within two working days) is as follows: -

- Data Protection Lead to identify & correct information held on the Company's CRM system, and notify nominated lead (or Director) of each team.
- Nominated lead (or Director) of each team to correct/amend at a team level and return confirmation to Data Protection Lead that this is complete.

### *The right to erasure*

Any requests for erasure to be sent to [enquiries@eahsn.org](mailto:enquiries@eahsn.org). The Data Protection Lead to review the request for suitability (depending on the legal basis for processing that applies.) Within two working days, that Data Protection Lead should notify the requestor of what will happen; either explaining that erasure is not possible/appropriate (given the legal basis for processing) or confirm the action that will be taken to ensure they can be forgotten. If the decision is not to erase, the requestor should also be notified of their 'Right to Object' to this decision, see section "The right to object" Where erasure is the confirmed course of action (within 5 working days) is:

- The Data Protection Lead to identify delete information held on corporate CRM system, and notify nominated lead (or Director) of each team.
- Comms/engagement team to ensure the individual(s) are removed from corporate email/circulation lists/directories
- Nominated lead (or Director) of each team to Identify & delete records at a team level (including individual email address books) • Ensure the individual(s) are removed from any or all email/circulation lists
- Return confirmation to Data Protection Lead that this is complete.

### *The right to restrict processing*

Any requests for restricted processing to be sent to [enquiries@eahsn.org](mailto:enquiries@eahsn.org). The Data Protection Lead to review the request for suitability (depending on the legal basis for processing that applies.) Within two

working days, that Data Protection Lead should notify the requestor to confirm the action that will be taken. The requestor should also be notified of their 'Right to Object' to this decision, see section "The right to object"

#### *The right to data portability*

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes; "to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability." Any requests for restricted processing to be sent to [enquiries@eahsn.org](mailto:enquiries@eahsn.org). The Data Protection Lead to review the request for suitability (depending on the legal basis for processing that applies.) Within two working days, the Data Protection Lead should notify the requestor to confirm the action that will be taken. The method of secure transfer may be different depending on the information held.

#### *The right to object*

Any objection to use, or decisions taken to be sent to [enquiries@eahsn.org](mailto:enquiries@eahsn.org). This should be forwarded within one working day to the Company's CEO for review. The Company CEO and Data Protection Lead will then review and consider the action to be taken and inform the individual of that outcome in writing within five working days and offer a further opportunity to meet or discuss the outcome. If the person objecting is still unhappy with the outcome, they should be advised of their right to report this to the ICO.

#### *Rights in relation to automated decision making and profiling*

Not applicable to Eastern AHSN's activities currently.

#### *Reporting a breach*

Data Protection Lead to be advised immediately of breaches and the Data Protection Lead will then notify the Company CEO and DataConnectivity as soon as possible to agree the immediate response. Action will be taken to mitigate or amend technical controls where possible.

Formal notification must be made to the ICO as soon as possible and a formal breach report completed within 48 hours of the breach becoming known. Consideration must be given as to whether the police need to be notified and / or a crime reported. Mechanisms for letting any affected or at-risk individuals know will also be actioned.

Under GDPR, you have rights to access your information, rectify any errors and restrict the way we use the data we hold on you at any time. We do not undertake any automated decision-making based on your data. You can unsubscribe or update your preferences from our mailing lists at any time by clicking the links at the bottom of the newsletters or events correspondence you receive or by emailing us at [enquiries@eahsn.org](mailto:enquiries@eahsn.org). Please note that the data we process for events is essential to their running. If you need to object after registering for an event, this may result in you being unable to attend the event.

If you would like to make a subject access request, or for any further enquiries, please email [enquiries@eahsn.org](mailto:enquiries@eahsn.org). We will comply with any request within 30 days.

If you are a Health InnEx East user and wish to make a request for erasure of your data, you can do this from the Health InnEx East website. While logged in, visit the 'Contact Support' page on the 'Help' tab at the home page. From there, fill in the form as necessary and choose 'Request for deregistration'

as your category of request. All personal data held on the website will be removed. Please note that posted comments will still remain but will be anonymised.

## Where to lodge a complaint

If you wish to lodge a complaint, you may contact us at [enquiries@eahsn.org](mailto:enquiries@eahsn.org). If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can also complain directly to the ICO at <https://ico.org.uk/>.

## Changes to our privacy policy

We regularly review our privacy policy. Any updates to the privacy notice will be clearly marked on the Eastern AHSN and Health InnEx East websites. The last update to this privacy notice was 12<sup>th</sup> September 2018.