

Claremont Clinic Main Privacy Notice

Version Date: March 2026

We understand how important it is to keep your personal information safe and secure and we take this very seriously. We have taken steps to make sure your personal information is looked after in the best possible way and we review this regularly.

Please read this privacy notice carefully, as it contains important information about how we use the personal and healthcare information we collect on your behalf.

Why we are providing this privacy notice

The United Kingdom (UK) General Data Protection Regulation (UKGDPR) and the Data Protection Act 2018 became law on the 25th May 2018 and 1st January 2021 when the UK exited the European Union.

We are required to provide you with this Privacy Notice by Law – under Articles 13 and 14 of the UK General Data Protection Regulation (GDPR). It explains how we at Claremont Clinic use the personal and healthcare information we collect, store and hold about you.

If you are unclear about how we process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please do contact our **Data Protection Officer** (details below).

This privacy notice applies to personal information processed by, or on behalf of the practice.

This notice explains:

- Who we are and why we collect information about you
- Information about our Data Protection Officer
- What kinds of personal information about you we hold and use (process)
- The legal grounds for our processing of your personal information (including when we share it with others)
- What should you do if your personal information changes?
- For how long your personal information is retained/stored by us?
- What are your rights under Data Protection Laws.

There is more detail provided in the tables below.

Who we are and why we collect information about you

For the purposes of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (UK) 2016/379) and the Data Protection Act 2018, Claremont Clinic are your data controller.

We, Claremont Clinic situated at 459-463 Romford Road, Forest Gate, London, E7 8AB, are a Data Controller of your information. This means we are responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient.

There may be times where we also process your information. That means we use it for a particular purpose and, therefore, on those occasions we may also be Data Processors. The purposes for which we use your information are set out in this Privacy Notice.

We are registered to the [Information Commissioner's Office](#). Our registration number is **Z4619169**.

Information Governance Leads: Dr Sadek Ahmed & Dr Shahid Choudhury

Caldicott Guardian: Dr Ciaran Joyce

Local Senior Information Risk Officer (SIRO): Dr Shahid Choudhury

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received within any NHS organisation. These records help to provide you with the best possible healthcare.

We collect and hold data for the sole purpose of providing healthcare services to our patients. In carrying out this role we may collect information about you which helps us respond to your queries or secure specialist services. We may keep your information in written form and/or in digital form. The records may include basic details about you, such as your name and address. They may also contain more sensitive information about your health and information such as outcomes of needs assessments.

The Data Protection Officer (DPO)

The Data Protection Officer for Claremont Clinic is the North East London GP Data Protection Officer, **Ms Sohifa Kader** and can be contacted at nel.gdpdpoig@nhs.net or via telephone on 0800 917 8607

You can write to them at

NHS NEL GP DPO Service
NHS North East London
9th Floor
20 Churchill Place
London
E14 5HJ

You can contact them if:

- You have any questions about how your information is being held.
- If you require access to your information or if you wish to make a change to your information.
- If you wish to make a complaint about anything to do with the personal and healthcare information we hold about you.
- Or any other query relating to this Policy and your rights as a patient.

Please note that you have the right to say “No” to our use of your personal information, but this may impact on our ability to provide appropriate care or services. Please speak to a member of the practice or the DPO to find out more.

What kinds of personal information about you we hold and use (process)

The health care professionals who provide you with care maintain records about your health and any treatment or care you have received previously or elsewhere (e.g. NHS Hospital Trust, other GP Surgeries, Out of Hours GP Centre, A&E, Walk-in clinic, etc.).

NHS health records may be electronic, paper-based or a mixture of both. We use a combination of working practices and technology to ensure that your information is kept confidential and secure.

Records which we may hold about you may include the following:

- Details about you, such as your address and next of kin, emergency contacts and power of attorney.
- Your home telephone number, mobile phone number, email address
- Any contact the surgery has had with you, such as appointments, clinic visits, immunisations, emergency appointments, etc.
- Notes and reports about your health, treatment and care
- Results of investigations, such as laboratory tests, x-rays, etc.
- Relevant information from relatives, advocates or those who care for you
- Information sent to us from a hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare.
- Any information sent to us from the Department of Health, NHS England and NHS Providers
- Information from social services
- Information from legal advisors and their representatives e.g. solicitors
- Information from government agencies e.g. benefits agencies, department of justice

Dependent on the purpose of processing, different categories of data may be used by Claremont Clinic. Data can be categorised using the following terms:

- Anonymised data – data where personal identifiable identifiers have been removed. Data protection laws and the Common Law of Confidentiality do not apply to anonymised data.
- Pseudonymised data – data where any information which could be used to identify an individual has been replaced with a fake identifier. Pseudonymised data remains personal data and as such the Common Law Duty of Confidentiality and Data Protection legislation apply and there must be a lawful reason for using such data.
- Person identifiable information (or personal data) – any information about an individual from which, either on its own or together with other information, that person may be identified. The Common Law Duty of Confidentiality and Data Protection legislation apply and there must be a lawful reason for using such data.

To find out more about the data processed for each purpose, please see the summaries below. In addition to the above types of data, some information is considered protected regardless of the purpose of processing; this information does not form part of your shared care record and is not disclosed to any other third parties without your permission unless there are exceptional circumstances, such as if the health and safety of others is at risk or if the law requires us to pass on such information.

Third parties mentioned on your medical record

Sometimes we record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself. Third parties can include: spouses, partners, and other family members.

The legal grounds for our processing of your personal information (including when we share it with others)

Provision of Direct Care

For your daily medical care and treatment:

- UK GDPR Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- UK GDPR Article 9(2)(h): Processing is necessary for medical diagnosis, the provision of health or social care, or treatment.
- DPA 2018 Schedule 1, Part 1, (2): This specifically permits processing for "health or social care purposes".

Public Health and Planning

To manage disease outbreaks or plan NHS services:

- UK GDPR Article 9(2)(i): Processing is necessary for reasons of public interest in the area of public health.
- DPA 2018 Schedule 1, Part 1, (3): Provides the domestic legal condition for processing data related to public health.

Vital Interests

In a life-or-death emergency where you cannot give consent:

- UK GDPR Article 6(1)(d): To protect the vital interests of the data subject or another person.
- UK GDPR Article 9(2)(c): Necessary where the individual is physically or legally incapable of giving consent.
- DPA 2018 Schedule 1, Part 3, (30): Relates to the protection of an individual's vital interests.

Legal Obligations

When the practice is required by law to share data (e.g., a court order):

- UK GDPR Article 6(1)(c): Processing is necessary for compliance with a legal obligation.
- DPA 2018 Section 8: Processing is necessary for the exercise of statutory functions.

Research and Statistics

- UK GDPR Article 9(2)(j): Processing is necessary for archiving, scientific, or historical research.
- DPA 2018 Schedule 1, Part 1, (4): Specifically covers processing for research purposes in the UK.

For activities not related to direct care or statutory requirements, the practice must obtain explicit consent:

- Third-party requests: Sharing information with insurance companies, solicitors, or employers.
- Non-care communications: Sending newsletters or information about Patient Participation Groups.
- Legal Basis: Article 6(1)(a) (Consent) and Article 9(2)(a) (Explicit Consent).

The sharing of your personal data also takes place in accordance with the common law duty of confidentiality. Performance of this duty does not require consent from the patient where the proposed use of their data is either for individual care or in the public interest.

We have a contract with NHS England to deliver healthcare services to you. This contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.

To comply with its legal obligations Claremont Clinic may send data to NHS Digital when directed by the Secretary of State for Health under the Health and Social Care Act 2012

Sometimes we also rely on the fact that you give us consent to use your personal and healthcare information so that we can take care of your healthcare needs. Please note that you have the right to withdraw consent at any time if you no longer wish to receive services from us.

The law states that personal information about your health falls into a special category of information because it is very sensitive. Reasons that may entitle us to use and process your information may be as follows:

- **Public Interest:** Where we may need to handle your personal information when it is considered to be in the public interest. For example, when there is an outbreak of a specific disease and we need to contact you for treatment, or we need to pass your information to relevant organisations to ensure you receive advice and/or treatment
- **Consent:** When you have given us consent
- **Vital Interest:** If you are incapable of giving consent, and we must use your information to protect your vital interests (e.g. if you have had an accident and you need emergency treatment)
- **Defending a claim:** If we need your information to defend a legal claim against us by you, or by another party
- **Providing you with medical care:** Where we need your information to provide you with medical and healthcare services

There are several pieces of legislation currently available to allow the processing of personal data and special category data in response to public health breakouts, which includes:

- Public Health (Control of Disease) Act 1984
- The Health and Social Care Act 2008 (by virtue of The Care Act 2014)

Organisations we share your personal information with

Information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you, your family and future generations. Data may be shared in an anonymised or pseudo-anonymised way.

Confidential information about your health and care is only used in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

Data (including special category data) may be shared between Claremont Clinic and the following:

- Healthcare professionals (such as doctors, consultants, nurses, etc)
- Other GP Practices within the North Newham Primary Care Network (Woodgrange Medical Practice and E7 Health)
- North East London Health & Care Partnership
- The London Care Record
- GP Federations
- Mental Health Providers
- Professional Bodies (i.e. GMC, RCN)
- Pharmacists
- Local Pharmacies
- Dentists
- Local authorities
- Community health services
- The Medical Examiner Office at Barts Health NHS Trust
- Extended Access (run by [Newham GP Cooperative](#) and the [Newham Health Collaborative](#))
- GP Connect via NHS Digital (including 111 services – transparency notice [here](#))

- Commissioners and the [NHS North East London Integrated Care Board](#) (NEL ICB)
- Barts Health AI Lung Cancer Screening Programme via NEL ICB
- [OpenSAFELY](#) secure COVID-19 research platform
- [NHS England](#) and The NHS [General Practice Extraction Service](#) (GPES) via NHS Digital
- [EMIS](#) (Optum)
- [X-ON Surgery Connect](#) (Cloud based telephony)
- [Accurx](#) (communications platform)
- [Healthtech1](#)
- iGPR
- [Care Quality Commission \(CQC\)](#)
- Valida [Universal Care Plan](#)
- [Joy Social Prescribing App](#)
- [Clinical Practice Research Datalink](#) (CPRD)
- Police and Judicial Services
- The East London Coroner
- Medical defence organisations/Solicitors
- Anyone whom you have given your consent to, to view or receive your record, or part of your record.

What should you do if your personal information changes?

You must keep us up to date with any changes to your personal information to ensure that we can provide you with appropriate medical services.

How long do we keep your record?

Claremont Clinic maintains your records in accordance with the [NHS Records Management Code of Practice 2021](#) (Updated 2023). We carefully consider any personal information that we store about you, and we will not keep your information for longer than is necessary for the purposes as set out in this Privacy Notice.

How we keep your personal information safe and secure

To protect personal and special category data, we make sure the information we hold is kept in secure locations and access to information is restricted to authorised personnel only.

Our appropriate technical and security measures include:

- all employees and contractors who are involved in the processing of personal data are suitably trained, on an annual basis, in maintaining the confidentiality and security of the personal data and are under contractual or statutory obligations of confidentiality concerning the personal data.
- robust policies and procedures
- technical security measures to prevent unauthorised access
 - use of ‘user access authentication’ mechanisms to make sure all instances of access to any personal data held on clinical systems are auditable against an individual, such as role-based access and Smartcard use to make sure appropriate and authorised access reminding staff of their responsibilities in complying with data protection legislation
- encrypting information transmitted between partners
- implementing and maintaining business continuity, disaster recovery and other relevant policies and procedures
- completion of the [Data Security and Protection Toolkit](#) (DSPT) an annual self-assessment requirement that ensure organisation are compliant with the latest data protection and cyber requirements.

- regular audit of policies and procedures to ensure adherence against these criteria

The [NHS Digital Code of Practice on Confidential Information](#) applies to all staff who access clinical systems. They are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared.

What are your rights?

Under data protection legislation, you have the right:

- **to be informed of the uses of your data:** this enables you to be informed how your data is processed
- **of access:** this enables you to have sight of or receive a copy of the personal information held about you and to check the lawful processing of it
- **to rectification:** this enables you to have any incomplete or inaccurate information held about you corrected
- **to erasure:** this enables you to request we erase personal data about you we hold. This is not an absolute right, and depending on the legal basis that applies, we may have overriding lawful grounds to continue to process your data
- **to restrict processing:** this enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it
- **to data portability:** this enables you to transfer your electronic personal information to another party, where appropriate.
- **to object:** this enables you to object to processing of personal data about you on grounds relating to your situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds.
- in relation to **automated decision making and profiling:** this enables you to be told if your data is being processed using automated software in relation to automated decision making and profiling. Please note at present no automated decision making or profiling is undertaken by Claremont Clinic.

Please note not all these rights are absolute.

If you wish to exercise your rights in any of the ways described above, you should in the first instance contact Claremont Clinic and address your query to the Information Governance leads.

Right to complain

You can get further advice or report a concern directly to Claremont Clinic.

Our Data Protection Officer function is provided by NHS North East London who can be contacted by
Post: NHS NEL GP DPO Service, NHS North East London, 9th Floor, 20 Churchill Place, London E14 5HJ
Phone: 0800 917 8607
Email: nel.gdpdpoig@nhs.net

You also have the right to contact the UK's data protection supervisory authority (Information Commissioner's Office) by:

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.
Phone: 0303 123 1113 (local rate) or 01625 545745 (national rate)
Email: <https://ico.org.uk/concerns/handling/>

The NHS Constitution

The [constitution](#) establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you will receive, the treatments and programmes available to you, confidentiality, information and your right to complain, if things go wrong.

NHS England

NHS England collects health information from the records health and social care providers keep about the care and treatment they give, to promote health or support improvements in the delivery of care services in England.

Our Website and Cookies

The only website this Privacy Notice applies to is the Surgery's website. If you use a link to any other website from the Surgery's website then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

The Surgery's website uses cookies. For more information on which cookies we use and how we use them, please see our Cookies Policy.

Age related changes

There are separate privacy notices for children and young adults (aged 13-16 years) and an information leaflet for children under 13.

Translation

If English is not your first language you can request a translation of this Privacy Notice. Please contact our Data Protection Officer.

Staff data

Employees of Claremont Clinic will have data stored and processed. For more information see the more detailed "Human Resources Privacy Notice"

Reviews of and changes to this privacy notice

We will review the information contained within this notice regularly and update it as required. We therefore recommend you check this webpage regularly to remain informed about the way in which we use your information.