egrist

Account Privacy Policy

Policy ownership:	Dr. C.D.Buckingham, C. Nicklin
To be published on website:	Yes
Governance links to other standards and policies:	General Privacy Policy, Cookie Policy, DPIA, Data Retention Schedule, DSP Toolkit (by 30th June every year)
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1. Introduction

Egrist Limited policies provide a framework to help make sure that the data held and processed by us is managed with the appropriate standards to keep it safe.

Our privacy policies are concerned with the lawful collection of data and the rights of individuals, system users and data subjects.

This policy does not relate to any data collection from direct correspondence or from our public website (such as information collected from our Contact Us page or our newsletter sign up facility). See General Privacy Policy for this information.

This policy covers the data we collect from our clients once they are signed into their account: their usage of our system and the mental health assessment data they input.

2. Privacy Policy

Egrist Limited ("**we**") are committed to protecting and respecting the privacy of our system's data subjects ("**you**") in accordance with the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018, which was amended to be read in conjunction with the UK GDPR. For the purpose of the Data Protection Act 2018 and this policy, the data controller is Egrist Limited, whose registered office is at The Anchor, Fore Street, Hartland, Bideford, England EX39 6BD.

This Privacy Policy provides an explanation as to what happens to any personal information that you provide to us, or that we collect from you, and your options regarding the ways in which the personal data is used. Please read the following carefully to understand our views and practices regarding personal information and how we will treat it. By visiting our websites and web tools, you are accepting and consenting to the practices described in this policy. If you have any requests concerning your personal information or any queries with regard to our data processing practices, please contact us using our dedicated Privacy mailbox.

What data we collect

This Privacy Policy relates to the Egrist mental health risk assessment facility. It covers the data we store about our users, who are mental health assessors, and patients. It relates to your usage of our system, your feedback regarding the system and the mental health assessment data that is input.

Cookies
Cookies are files saved on your phone, tablet, computer or other device when you visit a website.

We use strictly necessary cookies and these ensure our websites work properly. They are therefore needed to support the technical functionality of our websites and cannot be turned off. These cookies do not store any personal identification information (PII). They are session cookies, which delete themselves once you close your browser.

Occasionally, we use an analytics tool called Hotjar. Hotjar allows us to understand your needs by providing a way to analyse your use of our web tools. Hotjar uses cookies to collect data on your interactions with the system. These cookies do not store any PII; their contents are meaningless outside of Hotjar. These cookies are persistent, first-party cookies.

We value your privacy. These cookies do not store any PII.

For detailed information on the cookies we use and their purpose, see our Cookie Policy.

Patient data - from individuals or organisations who launch Egrist from their own Patient Management System
If you have your own Patient Management System (PMS), you send us a pseudonymised patient identifier which allows us to link assessments (held on our system) to the patient being assessed (whose details are held on your system). You also send us the name of the patient for display purposes for the duration of the

assessment. The name is not stored and is lost when the assessment session finishes; we do not store patient identification data for our users who have their own PMS.

Patient data - from individuals or organisations who launch Egrist from our Patient Management System

We collect limited patient data on your behalf if you do not have your own PMS. You enter a patient ID and name for the patient; the data are highly limited and stored in a separate database and on a separate server to assessment data.

Assessment data

We collect patient mental health assessment data from you when you work through our clinically devised methodology of information collection. This information forms the basis of the Egrist evaluation. The data are stored separately and linked to a patient using a pseudonymised patient identifier.

The assessment data consists of quantitative data (assigning numeric indicators to risk assessment questions) and text representing comments and managements. The system also allows you to optionally add date of birth, ethnicity, gender and whether the individual has a partner. This additional data cannot be linked back to a patient because we have no additional data narrowing down the person's identity due to the pseudonymous link.

The assessment data is special category data.

Assessor and system usage data

We collect basic personal information about mental health assessors when you use our system. Your name/identifier and IP address are collected.

We may also hold your contact details if you maintain a business relationship with us on behalf of your organisation. See our General Privacy Policy for information regarding contact and correspondence.

We may occasionally use an analytics tool, such as Hotjar, to help us understand the behaviour and needs of our users by providing a way to analyse your use of the system. The tool is not able to track any activity beyond the functionality of Egrist (when you are logged in). The data collected is limited to: geographic location – country only, preferred language, visited webpages, session date and time when webpage accessed, session duration, device type, device browser type, device operating system, device screen size/resolution, behaviour while on webpage (mouse events, movements and clicks). A system-generated User ID allows the tool to match data from multiple visits to a specific user, but has no other function; the user remains anonymous at all times. The data collected contains no PII and does not store an IP address.

We occasionally gather feedback from our users by using simple feedback functions within the system or distributing surveys to selected business partners. We only request feedback from existing customers when we already store contact details for these customers and maintain regular correspondence with them. We do not ask for personal information, we only ask questions related to the current and future functionality of our products. These surveys can therefore vary in their content, but they are always stored anonymously.

Why we need your data

We do not have access to any patient details, but we need an ID number that represents a patient so that we can link that patient to their assessment data. We have no way of knowing if the ID number has any meaning or is a reference to any other record. Whether the ID number is stored in our PMS or passed to our system from your PMS, this link is pseudonymous.

The assessment data form the basis of our system's functionality. This allows us to provide our assessment service.

Your information is needed for logging purposes. Storing an assessor's name/identifier alongside a patient's assessment can provide a useful audit trail for the assessment history of that patient. Assessments can be paused and resumed. During these times it can be important to understand which users have been involved in certain stages of the assessment. This data forms an important part of an assessment's metadata.

System usage data, including IP address, is collected when you log in. It is important to understand how many users are using our system and how many assessments result from that usage so that we can determine the performance of the system and future extensibility requirements for the system.

Data regarding feedback from users and how you interact with the system help us understand the behaviour and needs of our users. We can then identify issues that you run into when browsing our website and make changes that improve the website and the user experience. This improved understanding of the user experience allows us to optimise our service.

What we do with your data

We process patient data to create an identifier to link the patient to their assessment data and to retrieve the patient's name for the evaluation reports. Any data stored within our PMS is physically located in data centres within the UK.

Assessments are repeated and stored over time for you to evaluate changes in a patient's risk and adapt plans on how to help them. We use the assessment data to format the information into a risk assessment report which allows you to easily observe the areas of the assessment with the greatest risk and then plan for the risk management, help and treatment. Our system also facilitates the sharing of a patient from one assessor to another for professional purposes. This is a decision made by our users; our system allows for this functionality requested by our users. If your organisation has linked your patient's assessments to those conducted on the patient's behalf by another party, e.g. a GP or hospital, we will allow them to view your patient's assessment reports, and vice versa. All assessment data is physically located in data centres within the UK.

Your name/identifier is stored alongside an assessment, with a timestamp and IP address, when the assessment is saved. When you log into the system, your name/identifier, IP address and organisation name is stored in a system usage log. This maintains login and usage statistics for auditing, feeds into administrative reports and helps improve our service provision. All system usage data is physically located in data centres within the UK.

Data derived from feedback functions, such as online surveys, or tracking your interactions with our web tools are stored by our chosen analytics tool, Hotjar. The data are hosted in data centres within the EU. The data are stored anonymously and separately from all other data. Data collected through Hotjar is exclusively stored and reserved for use by us. Hotjar does not make use of the data collected in any form, does not further process the data and does not sell the data to anyone at any time. We only use this information to optimise our service. Any survey data collected by other means is fully anonymous and consolidated simply, for example using a spreadsheet, on our UK-based document storage area.

We do not process the data recorded here for any other purposes than those listed. We do not transfer data anywhere else.

Profiling

As part of the patient assessment, we will use computer programs to process the assessment data that you supply in order to provide you with a patient evaluation. This is a simple form of profiling where we format the data, for example using colouring, and structure the evaluation report to support your patient assessment.

How long we keep your data

If our relationship with you ends, the pseudonymous link between patient and assessment data is severed and the assessment data is archived.

If you use our PMS and discontinue your use of our services, we delete your patient identification data from our database on request or after two years.

If you use your own PMS, the pseudonymous link between your system and our system is severed when you discontinue your use of our services.

Assessment data remaining on our system will be archived and rendered anonymous by severing the pseudonymous link and upholding data minimisation principles.

Data collected in our system usage logs and metadata about assessment saves remain with us unless you ask us to delete them. You can ask us to delete this data by contacting us using our dedicated Privacy mailbox.

Any data collected by our analytics tool, Hotjar Recordings, Surveys or Feedback functions, will be retained for no more than 365 days. Any analytics data derived from Hotjar Recordings, Surveys or Feedback functions will be retained for no more than 365 days.

Any survey data collected by other means will be retained for no more than 365 days. Any analytics data derived from them will be retained for no more than 365 days.

Our organisation's full Data Retention Schedule is available on request by emailing our dedicated Privacy mailbox.

Our legal basis for processing your data

We are not the controller for patient data which is stored in our PMS. We only process patient data to link to assessment data on behalf of our customer (the controller for patient data).

We are both a processor and controller of mental health assessment data. When you enter assessment data into the system, the patient is the data subject. We process the data for you to deliver the functionality of our system with regard to the risk assessment and reporting for that patient. We also analyse the data for the purposes of research to help us better understand mental health risk assessment, improve the capabilities of our system and provide all users with better decision support. We have determined that this would constitute a slightly different processing activity and that this activity uses our own processing instructions, not those of our user. We therefore have responsibilities as a controller of this data and have stated Legitimate Interest as our lawful basis. Due to the nature of this special category data, we have performed a Data Protection Impact Assessment (DPIA). A summary is available on our website and the full document can be made available on request.

When we collect information about your system usage (i.e. when you log in), you (the assessor) are the data subject and we are the controller for that data. With Legitimate Interest as our lawful basis, we maintain login and usage statistics to help improve our service provision, provide our customers with an audit trail and generate statistical reports.

When we collect information about your interactions with our system, including online surveys, you (the assessor) are the data subject and we are the controller for that data; the data collected is owned by us as the website owner of where the data was gathered. With Legitimate Interest as our lawful basis, we aim to use the data to improve our service provision. However, this data is completely anonymous and does not fall within the scope of the UK GDPR.

We do not share information

We do not share or sell any information collected from Egrist.

We occasionally use a third-party service, Hotjar, to collect information on your interactions with our web tools. Hotjar does not make use of the data collected in any form, does not further process the data and does not sell the data to anyone at any time. Furthermore, this data is collected anonymously.

Your rights

All data subjects are entitled to know whether we hold information about them and, if we do, to have access to that information and request it to be deleted or corrected if it is inaccurate.

Under the Data Protection Act 2018, you have the right to find out what information we store about you. You have the right to:
- be informed about how your data is being used
- access personal data
- have incorrect or incomplete data updated
- have data erased in certain circumstances
- withdraw consent, stop or restrict the processing of your data in certain circumstances
- organise data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

Please note that we will make every effort to agree to and comply with all data requests. However, in some circumstances, we may consider there to be a valid reason to justify continued processing of your data. We would only be entitled to refuse to comply with your request under very specific circumstances. In the event that we refuse your request under these rights, we will provide you with a reason as to why and you have the right to complain. You can find out more about your rights under the UK's data protection laws at www.ico.org.uk.

If you wish to exercise any of these rights, please contact us using our dedicated Privacy mailbox. We will seek to deal with your request as soon as possible and at least within one calendar month (subject to any extensions to which we are lawfully entitled).

Any data collected by a website interaction tool such as Hotjar, is anonymous. We cannot exercise any data subject rights on the data collected by Hotjar as we do not have any PII with which to identify a data subject. We do not use this data for any other purpose than described here and Hotjar do not further process or sell the data they store. However, if users would prefer not to contribute their website behaviour tracking data to our analysis, Hotjar can be disabled by setting the browser's Do Not Track request. Hotjar will disable its activity and will not collect or track browsing data. Hotjar provide a help page on how to enable the Do Not Track setting for various browsers.

Updates to the Privacy Policy and Cookie Policy

We may review and amend the contents of this Privacy Policy from time to time, therefore we recommend you check it regularly.

Contact us

If you have questions regarding the contents of this policy or wish to exercise any of your rights described here, you can contact our Data Protection Officer:

By email: privacy@egrist.co.uk

If you feel we have not addressed your concerns satisfactorily, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).