

Privacy Impact Statement

The following table applies for both Public and Private patients and shows the categories of Personal Data processed by SouthDoc's out of hour's family doctor service.

Category of Personal Data Article 9	Purpose of Processing Article 6	Lawfulness of Processing Article 6 (1)
<ul style="list-style-type: none"> • Administrative information • Name, address contact details Phone, email, mobile • Appointments • Personal details, PPS Numbers, Medical Card number • Personal details • Employee details • Clinical information • Financial & Company Information • Biometric Data 	<ul style="list-style-type: none"> • Necessary to support the administration of patient care at SouthDoc Out of Hours Family Doctor Service. • To provide an Out of Hours Medical Service based in Cork and Kerry 	<ul style="list-style-type: none"> • General Data Protection GDPR Article 6 (1) • Processing of Data is necessary to protect the vital interests of the Data subject or of another natural person. <p>The lawfulness of processing Data could also be argued under Article 6 (1) which is based on consent and Article 6 (f). Article 9 Special Category Data can be processed if one of the exemptions applies in this case. Special categories are processed in Article 9:2 (b) and Article 9.2 (1). Please see notes on this table.</p>

Categories are processed under derogation in Articles 9:2 (b) and Article 9:2 (1). Please see notes on this table.

Article 9 Special Category Data 1 Medical Records	Necessary to provide patient care in SouthDoc	Articles 6 1 (D) Data Processing
<ul style="list-style-type: none"> • Individual / Health Identifier GMS number. PPS number, DOB, religion, sexual subject orientation, gender, family history, contact details of next of kin, contact details of carers. Vaccination details, medication details, allergy details, current and past medical history, genetic Data, laboratory test results, imaging test results, smear patient test results, ECG's ultra sound, scan images. • All other Data required for Medical Care. 	<ul style="list-style-type: none"> • OOH GP care service. • Information of a personal nature. • Special Category Data is needed in order to provide proper care to the patient. The PPS number is needed for specific schemes such as sickness certification, Dept. of Social Protection, Cervical Screening – HSE 	<p>This is necessary in order to protect the vital interest of the Data subject or of another natural person.</p> <p>The lawfulness of processing should also be argued under Article 6 (1) (a) which is based on consent and Article 6 (1) (f) Article 9 Special Category Data can be processed if one of the exemptions outlined in Article 6 applied or more than one exemption applies. In this case special categories of Data are processed under derogations in Articles 9 (2) (H) and 9.2 (1). Please refer to the notes under this table.</p>

Article 9 Special Category Data Medical Records	Necessary to provide patient care in SouthDoc	Articles (6) 1 (D) Data Processing
<p>Account Details: Record of billable services provided. Patient, name, address, contact details, billing and payment records for GMS and private patients, credit card and bank details.</p>	<p>Required for providing a service and billing. Also required for submission of reimbursement claims to the HSE, Primary Care Reimbursement Service</p>	<p>Article 6 1 (c) processing is necessary for compliance with a legal obligation to which the Data Controller subject / Revenue medical and legal obligations and Article 6 (1) (b) in relation to being paid for providing a service to private patients</p>

Bodies with whom we share Personal Data:

Categories of Recipient	Description
Health and Social Care Provider	All GPs, Health Service Executive, HSE, Voluntary Hospitals, Private Hospitals and Clinics, Private Consultants, Physiotherapists, Occupational Therapists, Speech and Language Therapists, Social Care Workers, Palliative Care Services, Out of Hours' Services. Diagnostic Imaging services, hospital laboratories and all other health care providers, Pathology Lab, Medical Services
Data Processors with a Contract	GP Practices, online Data bulk companies, Health Link, Health Mail and all other secure Health link which provide for the transfer of Data
Legal Arrangements	Coroner, Gardaí, Revenue, HSE, Dept of Social Protection Medical Council, Irish Council of General Practitioners, (ICGP)
Public Health	Public Health Infections, Disease notification, Influenza surveillance
Third Parties with explicit patient consent	Solicitors, Company Solicitor, Insurance Companies, Health Insurance Companies, BOD, IT Service Providers, IT Processors HSE, GPs Medical Specialists

Contact Details:

Contact Us	Opening Hours of Service	Useful Numbers	Regional Out of Hours
SouthDoc HQ, Floors 2 & 3, Hilliard House, High Street, Killarney, Co Kerry	09.00-17.30	University Hospital Kerry 066 71 84000	CIT 1850 837 427
DPO, Floors 2 & 3, Hilliard House, High Street, Killarney, Co Kerry	09.00-17.30	064 66 91974	

All Data Access Requests must be accompanied by Data Subject Applicant Consent, ID and proof of address. Please note that all Data request applicants have the option to submit either manually or electronically. Please note that when you are making a Data Access Request it is important to provide your DOB for ease of processing.