

## Honeydew Health Ltd Fair processing notice for Honeydew ‘Resolve’ clients

### Scope

This Fair Processing Notice (“Notice”) describes how Honeydew collects and processes personal information on behalf of its Occupational Health Case Management clients using an online software application called ‘Resolve’.

### Aims

This Notice tells you what personal information Honeydew collects about the employees of its client organisations, what protections are in place to keep it secure and how we comply with our legal requirements under data protection legislation as set out below.

### Data Protection Legislation

1. The Data Protection Act 2018
2. The General Data Protection Regulation
3. Any future data protection legislation which may come into force from time to time

### Data protection officer

Inka Howorth

Director of Product

E: [inka@Honeydew-health.com](mailto:inka@Honeydew-health.com)

M: 07940 410560

### **What information we hold**

The information we hold about you is kept to a minimum and details only what is required to allow us to carry out health assessments and maintain adequate records required by the General Medical Council and other authorities.

We may hold the following information about you:

- Details about you such as your name, telephone number(s), e-mail and/or address;
- Details of your employer and job (if relevant);
- Details of your general practitioner (if relevant);
- Details including medical history, medication and clinical observations of any medicals or health assessments that we carry out;
- Information from other bodies such as your employer, general practitioner or other professionals where this has been provided to enable assessments to be made of your medical fitness or any appropriate adaptations to your employment.

### **Why we hold your personal information**

Honeydew does not employ any clinical staff directly but we use third-party suppliers to conduct all health assessments. Honeydew have written agreements in place with all third-party suppliers to ensure all data processing is done in line with data protection legislation.

The clinical staff who conduct the assessments, maintain personal information about you to meet statutory requirements and guidelines, and to enable us to keep an accurate record of contacts that we have had with you for medical or other health assessments. Maintaining health and occupational health data is included in one of the conditions for processing special category data.

Legislation requires certain occupational health records to be kept for periods of up to 10 years, 40 years in some cases. The Private and Voluntary Health Care (England) Regulations 2001, Schedule 3, lays down minimum periods for the retention of private records which for our purposes, is at least 8 years from the date of the last entry.

### **Maintaining confidentiality of you records**

Honeydew stores medical records on a central server in the UK hosted by Amazon Web Services Ltd to ensure security of the data. Honeydew's approved suppliers ensure that their data storage facilities meet the requirements of data protection regulations.

We do not share information we hold about you with any other organisations without your expressed consent. Very rarely we may need to override this, following General Medical Council guidance where there is a legal requirement or significant risk to others but would normally seek your consent to do this first.

### **Access to personal information**

You have a right to request access, to view or to obtain copies of what information we hold about you and to have it amended should it be inaccurate. You may also request that information is deleted, but there are some circumstances where we are required to keep records so will not be able to comply with this. You can request this information using any of the contact details below.

We will respond to your request within one month. We may need to request additional information to establish your identity including date of birth, address, and any contact details that we hold to ensure that others are not trying to access your data.

### **Raising concerns**

If you have any concerns about the data we hold about you or how we use and process it, please contact our data protection officer in the first instance (see contact details). If you are still not satisfied you may contact the Information Commissioner's Office.

Honeydew Health Ltd is registered with the ICO (registration number Z3434877)

### **Contact details**

Write to us at:	Honeydew Health Ltd 4 Crown Place, London EC2A 4BT
e-mail us at:	<a href="mailto:Hello@honeydew-health.com">Hello@honeydew-health.com</a>
Call us on:	+44(0) 20 3286 2133
Name of data protection officer:	Inka Howorth
Information Commissioner	0303 123 1113 <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>

Oct 2023