

# **DATA PROTECTION POLICY**

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# **DATA PROTECTION POLICY**

#### **Purpose**

This purpose of this policy is to outlines Riverwest Medical Practice commitment to processing personal data in a lawful, fair and transparent manner. This policy applies to all Employees of Riverwest Medical Practice, its contractors and third parties who process personal data on behalf of the organization.

#### Scope

This policy applies to all personal data processed by the organization including data related to employees, patients, contractors and other stakeholders. It covers data collected, stored, processed, transmitted and deleted by Riverwest Medical both electronically and on paper.

# **Data Protection Principles**

# Riverwest Medical adheres to the following key principles of data protection

- Lawfulness, Fairness and Transparency; Personal data shall be processed lawfully, fairly and in a transparent manner
- **Purpose Limitation**; Personal data shall be collected for specified explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- > Data Minimization; Personal data shall be adequate, relevant and limited to what is necessary for the purposes for which it is processed
- Accuracy; Personal data shall be accurate and where necessary kept up to date
- > Storage Limitation; Personal data shall be kept in a form that permits identification of data subjects for no longer than necessary for the purposes for which the data is processed
- ➤ Integrity and Confidentiality; Personal data shall be processed in a manner that ensures appropriate security including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage using appropriate technical and organisational measures.
- > Accountability; Riverwest Medical shall be responsible for and able to demonstrate compliance with the above principles

## **Legal Basis for Processing**

# Riverwest Medical will process personal data based on one or more of the following legal basis;

- The data subject has given consent to the processing of his or her personal data for one or more specific purpose
- > Processing data is necessary for the performance of a contract to which the data subject is part of.
- Processing is necessary for compliance with a legal obligation to which the controller is subject;
- Processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- 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;
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.



# **Rights of Data Subjects**

# Riverwest Medical recognizes and respects the rights of data subjects including;

- > The right to be informed about the collection and use of their personal data
- > The right of access to their personal data
- The right to rectification of inaccurate or incomplete data
- The right to erasure (The right to be forgotten)
- The right to restrict processing
- > The right to data portability
- > The right to object to processing
- Rights in relation to automated decision making and profiling

#### **Data Security**

# Riverwest Medical is committed to ensuring the security of personal data through the implementation of appropriate measures including

- Access controls and user authentication
- Procedures for reporting and responding to data breaches
- Encryption of sensitive personal data
- Security Audits and Risk assessments
- Employee Training and Awareness programs

#### **Data Breach Response**

In the event of a Data breach, Riverwest Medical will promptly assess the situation and adhere to ICGP guidelines "Protocol for Managing a Data Breach"

## **Data Retention and Disposal**

Riverwest Medical will retain personal data only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal, regulatory, /business requirements. Personal data that is no longer required will be securely deleted/destroyed.

# **Review and Updates**

This policy will be reviewed and updated as necessary to reflect changes in data protection laws and regulations, business operations or other relevant factors.