**Anolift Privacy Notice - Data Protection and Confidentiality**

**The purpose of this notice is to inform you of how your personal data is collected and processed through the Anolift database,** managed by THD UK Ltd, a company registered in England and Wales under number 06560635 with a registered office at Unit-3 Great Western Business Park, Mc Kenzie Way, Worcester, Worcestershire, WR4 9PT (“**THD**”). THD is the data controller with primary responsibility for the collection and processing of personal.

**What is the Anolift database?**

The Anolift database is the UK registry collecting technical and outcome data on those treated with the THD (Transanal Haemorrhoidal De-arterialisation) plus Anolift procedure for symptomatic haemorrhoids. The information contains personal data and is collected only with the consent of the data subjects it relates to. Some of the personal data collected and processed is health related personal data, which benefits from additional protection and is knowns as “special category data”. The database will be used by THD to confirm the safety of the Anolift procedure and assess its efficacy both in terms of recurrence, symptom severity and quality of life.

**What information does it contain?**

The Anolift database will contain the following personal data relating to named or otherwise identifiable patients and includes health data:

1. pre-operative clinical and assessment details,
2. operative and technical detail
3. regular follow up data on outcome at predetermined times

Some inputting of data (such as symptom severity) may be provided remotely by the patient to facilitate population of the database. All Haemorrhoidal Artery Ligation operations performed in the UK should be audited to maintain compliance with NICE guidelines and the registry will provide a regulatory forum for this service delivery.

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**What happens to the personal data and who can see it?**

The personal data are collected by the doctors, nurses, and hospital staff treating and managing the patient. Hospital computers are used to collect the information, which is collated, checked and approved before being sent to a single secure database server on the NHS network. During the personal data transfer from the hospital to the NHS server the information is encrypted (locked) to ensure it cannot be interfered with. Only an approved member of staff at the hospital has access to be able to upload the personal data onto the Anolift database. Once the records have been uploaded, they can be reviewed by authorised staff at the hospital using an approved user account with a secure password.

The personal data collected is valuable as it allows clinicians to understand the effectiveness of the THD Anolift operation over an extended period of time, the profile of patients and the results that are being achieved by hospitals around the countryThe personal data will be analysed by Dendrite to produce Anolift annual reports. The reports produced by Dendrite do not contain the details of individual patients. They report results for groups of patients and are therefore “aggregated” and “anonymised”, and are no longer classed as personal data. The reports are broken down by region or hospital, and by other important information that may be related to outcomes such as age, general health status.

No personal data will be shared with any Third Party and no personal data will be transferred or processed outside of the UK. It will be used (usually in an anoymised and aggregated way)solely to address the efficacy and safety of the THD Anolift procedure, and no personal data will be subject to automated decision-making

**Anolift Database Server**

The server is hosted within a data centre in London, by RedCentric. This is a tier four data centre which meets the highest levels of building security. RedCentric is a sub-processor of personal data for Dendrite (who is a processor of personal data on behalf of THD) when it stores the personal data on these servers and Red Centric have entered into a data processing agreement with Dendrite. Both Dendrite and RedCentric comply with the applicable data protection legislation in their collection, processing and storage of personal data.

The service delivery and information governance provided complies with ISO 20000 & ISO 9001 accreditation and the security structure is aligned alongside ISO27001. The security arrangements are internally audited approximately every three months and externally audited every six months.

All servers have firewall and anti-virus software installed which is configured to use real-time scanning.

## Backup Resilience

The personal data is securely backed-up each day. All backed up data stored is compressed, de-duplicated and encrypted within a secure off-site vault.

There are two backup vaults, the primary one is hosted locally and is then backed up to a secure secondary off-site vault hosted within a separate datacentre located at Heathrow.

**Can I opt out of the Anolift registry?**

National clinical audit is most effective when it has information from as many patients as possible, and the Anolift Registry collects some specific information to allow us to assess the quality of care delivered to patients. If you do not want your personal data to be used, please tell the people who are treating you. When the people who are treating you inform Dendrite (our technology partner) about your decision, they will make sure that any personal data about you held on the Anolift registry is removed from the audit database and will ensure that the people who are treating you then confirm to you that your personal data has been removed. This will not affect your treatment in any way.

**Patient Related Outcome Measures (PROMs)**

When you are first seen by the people who are treating you, they will ask for your consent to receive emails and/or txt messages from the Anolift registry. If you give your consent, emails or txt messages will be sent to you periodically containing a link which, when you click on it, will present some simple questions related to the treatment that you have received that will enable you to inform the team treating you how you feel.  When you submit those questions, your answers are then submitted into the Anolift registry so that those people treating you can monitor your responses and assess the effectiveness of your treatment.  However, if you prefer you may refuse to receive emails or texts (and then you will not receive these emails/txts). If you initially consent but then change your mind, you can either (i) click on the ‘opt out’ link within the email/txt questionnaire or (ii) inform the people treating you and they will update the database to ensure you don’t receive any more.

**Dendrite Security**

Dendrite acts as a data processor on behalf of THD and is assessed against NHS Information Governance standards, which includes both physical and organisational security measures. Dendrite’s toolkit assessment score is available on the IG Toolkit website (https://www.dsptoolkit.nhs.uk/OrganisationSearch/8HJ38).

The computer software program created by Dendrite that holds the Anolift data has been independently tested to ensure that it is not vulnerable to unauthorised access, or internal breaches of security.

**Your Legal Rights (as a Data Subject)**

**You have the right to:**

1. Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected, though we may need to verify the accuracy of the new personal data you provide to us.
3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
5. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

If you want us to establish the personal data's accuracy.

Where our use of the personal data is unlawful but you do not want us to erase it.

Where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims.

You have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

1. Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
2. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Further information**

IF you have any questions or requests about the Anolift database or your personal data please contact us ig@thdlab.co.uk (email for the Anolift Project Team).