

LEGITIMATE INTERESTS ASSESSMENT for Synectics Medical Ltd

Synectics Medical Ltd has undertaken a Legitimate Interests Assessment and is documented below. The Assessment conforms to the Guidance for Legitimate Interest Assessments provided by the Information Commissioner's Office ('ICO').

See ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/

IDENTIFYING A LEGITIMATE INTEREST

Question	Answer
Why do you want to process the data - what are you trying to achieve?	To provide informative documentation, training and cost cutting information to healthcare professionals (including Consultants, doctors their Secretarial Staff) and those who work within healthcare institutions either NHS or private for healthcare purposes including also Managers and Nurses and other NHS staff according to their qualifications, location, speciality, position and other information supplied by the doctors and others concerned.
Who benefits from the processing? In what way?	Two groups - 1) The data subjects themselves (Consultants, their secretaries and Endoscopy/theatre Staff, and Nurses) and 2) those other healthcare professionals in procurement their managers who need to be contacted in relation to financial savings for the hospitals and Hospital Trusts.
Are there any wider public benefits to the processing?	Yes, the data is sent to both NHS and Private hospital so in turn the savings are offered across the board.
How important are those benefits?	Very important for helping Consultants, medical researchers, and healthcare professionals in sourcing information on products used in the diagnosing and prevention of cancer which in turn results in a cost reduction to the NHS.
What would the impact be if you couldn't go ahead?	We would not be able to offer immediate information at hand for the professional to be up to speed and fully informed on the latest medical advances available in their decision-making process to be a detriment to all concerned.
Would your use of the data be unethical or unlawful in any way?	No.

THE NECESSITY TEST

Does this processing actually help to further that interest?	Yes, the processing is an integral part of the method of communication required.
Is it a reasonable way to go about it?	Yes, the data stored and the Internet as a means of communicating with the data subjects to obtain their up to date details and provide the information efficiently and cost-effectively to the healthcare professionals as required.
Is there another less intrusive way to achieve the same result?	Intrusion to data subjects is minimal and makes use of email, telephone, fax and postal methods of communication with data subjects. As the data is collected as given subjects can chose to change information and opt out as necessary.

THE BALANCING TEST

What is the nature of your relationship with the individual?	Synectics Medical Ltd is an independent company from the data subjects. The data subjects are part of a public organisation (NHS) or under the remit of another Company either LTD, PLC offering professional medical services.
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Is any of the data particularly sensitive or private?	No. It mainly consists of names, work contact details (telephone, fax, email and postal addresses either public NHS or other Hospitals), qualifications, where and when qualified, specialty and special interests.
Would people expect you to use their data in this way?	As doctors, Theatre staff, nurses and NHS Managerial staff, the data subjects will expect their identity, location, qualifications, experience and areas of expertise to be made available to other healthcare professionals as and when necessary.
Are you happy to explain it to them?	Yes. Data subjects are regularly contacted to inform them of the existing details held processed, to enable them to update these details where necessary and to re-iterate the use to which the details as part of any administration.
Are some people likely to object or find it intrusive?	Inevitably but experience has shown this to be a very small number (< 0.1%)
What is the possible impact on the individual?	Minimal. Regular contact more with data subjects by email, telephone, fax and post is normally twice per year.
Are any of the individuals vulnerable in any other way?	No.
Can you adopt any safeguards to minimise the impact?	Yes. Details of contact dates and response dates are stored to avoid repetition of contact and deletions are marked as such to avoid contact again through subsequent research.
Can you offer an opt-out?	Yes, if the data subject is no longer working in that position for any reason or does not want to receive further information we offer an opt out option on all emails sent.

OUTCOME OF ASSESSMENT

The above assessment shows that the use of Synectics Medical Ltd data is of considerable benefit not only to the Controller but also to the Data Subjects concerned (consisting of Consultants, Doctors, Procurement Managers, Nurses and other NHS Staff) in assisting to provide them with informative documentation, training and cost cutting information across the healthcare industry, The inclusion of Data Subjects may result in Data Subjects receiving postal, telephonic, fax or email (where they have provided it) communications from the Controller. Synectics Medical Ltd will normally use the location, specialty and special interest data provided in the data to communicate with Data Subjects likely to be interested in the topic concerned. If the topic is of no interest to the Data Subject, it is easy to dispose of, or delete, the communication concerned. This is a minor inconvenience, which can easily be delegated to secretarial staff, is insignificant compared to the potential benefits of the information to a) Data Subjects themselves by promoting their experience, expertise and interests further to enhance their knowledge which in turn is a benefit b) users of the NHS and other healthcare organisations.

Signed: 

Geoffrey Blyth

Position: Director

Review Date: 18th May 2018