

# Privacy Notice

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We know that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This Privacy Notice describes how we collect and process your personal information through the Whzan website and tablet devices and applications that reference this Privacy Notice (together "Whzan Services").

## Controllers of Personal Information

Solcom Limited act as data processors storing and processing information on behalf of our customers, the 'Data Controllers'. These would typically be (but are not limited to) NHS Clinical Commissioning Groups (CCGs), Local Authorities, local health services and care homes.

## What Personal Information About Customers Does Solcom Limited Collect?

We collect your personal information in order to provide and continually improve our products and services and to

Here are the types of information we gather:

- **Information required to provide secure access to your data:** We receive and store information such as contact details, name, NHS ID, Date of Birth etc. in order to be able to link collected medical data to the specific individuals to which it relates and to ensure access is restricted to those with a specific need who have been authorised to access it. You have a right to request that this information is not stored however it will make service provision more difficult and may limit the service we are able to provide.
- **Collected Data:** The Whzan system can receive and store medical readings, questionnaire responses and telecare information that is either manually entered or automatically collected by remote sensors. The actual information processed will depend on the solution and options in use.

In accordance with our policy of data minimisation we collect and store only the minimum amount of data required to provide the Whzan service to you.

## For What Purposes Does Solcom Limited Process Your Personal Information?

*We process your personal information to operate, provide, and improve the Whzan Services that we offer our customers. These purposes include:*

- **Collection and recording of health information.** We use your personal information to collect and securely display health related information such as medical readings (blood pressure, temperature, etc.), questionnaire responses and telecare sensor data.
- **Provide, troubleshoot, and improve Whzan Services.** We use your personal information to provide functionality, analyse performance, fix errors, and improve usability and effectiveness of the Whzan Services.
- **Comply with legal obligations.** In certain cases, we have a legal obligation to collect and process your personal information. For instance, we collect your name and date of birth for identification purposes and to securely attribute your reading data.
- **Purposes for which we seek your consent.** We may also ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.

Where the lawful basis for processing your data is consent we will notify you should the purpose of data collection change and will re-obtain the necessary consent from you.

## What About Cookies?

To enable our systems to recognise your browser or device and to provide Whzan Services to you, we use cookies. These cookies do not track personal information and are used solely to maintain the system state when navigating within the website.

## Does Solcom Limited Share Your Personal Information?

Information about our customers is an important part of our business and we are not in the business of selling our customers' personal information to others. Solcom Limited shares customers' information only as described below.

- **Transactions involving Third Parties:** Where requested and authorised data may be transferred to other medical record systems such as SystmOne, EMIS, etc. You have the right to request that this transfer is restricted or prevented altogether.
- **Third Party Service Providers:** Your data is stored on our behalf on secure cloud servers provided by Microsoft. For details of their privacy policy see [here](#).
- **Business Transfers:** As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the unlikely event that Solcom Limited.com, Inc. or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.
- **Protection of Solcom Limited and Others:** We release account and other personal information when release is required in order to comply with the law.

Other than as set out above, you will receive notice when personal information about you might be shared with third parties and you will have an opportunity to choose not to share the information.

## Transfers out of the European Economic Area.

All data is stored on cloud servers within the UK.

## How Secure is Information About Me?

We design our systems with your security and privacy in mind.

- We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.
- We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal customer information. Our security procedures mean that we may request proof of identity before we disclose personal information to you.
- Our devices offer security features to protect them against unauthorised access and loss of data including encryption of data at rest both in the local device and cloud storage.
- It is important for you to protect against unauthorised access to your password and to your computers, devices, and applications. Be sure to sign off when you finish using a shared computer.

## What About Third-Party Advertisers and Links to Other Websites?

Whzan Services do not include links to advertisers or other websites. Web-links configured for the tablet devices are displayed within a sandboxed window to ensure security.

## What Choices Do I Have?

If you have any questions or objection as to how we collect and process your personal information, please contact our Customer Service.

- As described above, you can choose not to provide certain information but then you might not be able to take advantage of many of the Whzan Services.
- Note that basic identification information is required to securely validate user access and opting out of processing this information will make it impossible for us to safely provide a service to you.
- The Help feature on most browsers and devices will tell you how to prevent your browser or device from accepting new cookies, how to have the browser notify you when you receive a new cookie or how to disable cookies altogether. Because cookies allow you to take advantage of some essential Whzan Services, we recommend that you leave them turned on. For instance, if you block or otherwise reject our cookies, you will not be able to add items to your Shopping Basket, proceed to Checkout, or use any Whzan Services that require you to Sign in. For more information about cookies, see our Cookies Notice.
- When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop any further processing of your data for that purpose.

In addition, subject to applicable law, you have the right to request access to, correct, and delete your personal data, and to ask for data portability.

You may also object to our processing of your personal data or ask that we restrict the processing of your personal data in certain instances.

If you wish to do any of these things or require further information, please contact our support team at [support@solcom.com](mailto:support@solcom.com) or phone 01983 817000

## How Long Do We Keep Your Personal Information?

We keep your personal information to enable your continued use of Whzan Services, for as long as it is required in order to fulfil the relevant purposes described in this Privacy Notice, as may be required by law, or as otherwise communicated to you. When there is no longer a legal basis for retaining data or you have requested its removal it will be securely deleted from our servers.

## NHS Numbers

If you are receiving care from a health or care organisation, that organisation may share your NHS number with other organisations providing your care. This is so that the health and care organisations are using the same number to identify you whilst providing your care. By using the same number the health and care organisations can work together more closely to improve your care and support.

Your NHS number is accessed through an NHS Digital service called the Personal Demographic Service (PDS). A health or care organisation sends basic information such as your name, address and date of birth to the PDS in order to find your NHS number. Once retrieved from the PDS, the NHS number is stored in our case management system. These data are retained in line with our record retention policies and in accordance with the Data Protection Act 1998, Government record retention regulations and best practice.

We will share information only to provide health and care professionals directly involved in your care access to the most up-to-date information about you. Access to information is strictly controlled, based on the role of the professional, and where the user has a direct care relationship with you.

The use of joined up information across health and social care brings many benefits. One specific example where this will be the case is the discharge of patients into social care. Delays in discharge (commonly known as bed blocking) can occur because details of social care involvement are not readily available to the staff on the hospital ward. The hospital does not know who to contact to discuss the ongoing care of a patient. The linking of social care and health information via the NHS number will help hospital staff quickly identify if social care support is already in place and who the most appropriate contact is. Ongoing care can be planned earlier in the process, because hospital staff will know who to talk to.

You have the right to object to the processing of your NHS number in this way. This will not stop you from receiving care, but will result in the benefits outlined above not being realised. To help you decide, we will discuss with you how this may affect our ability to provide you with care, and any other options that you have.

If you wish to opt-out from the use of your NHS number in this way, you can contact us by phoning 01983 817000 or by emailing [support@whzan.com](mailto:support@whzan.com) with details of your request.

## NHS Care Identity credentials

Please note that if you access our service using your NHS Care Identity credentials, the identity access and management services are managed by NHS Digital. NHS Digital is the controller for any personal information you provided to NHS Digital to get a national digital identity and authenticate your claim to that identity, and uses that personal information solely for that single purpose. For any personal information, our role is a “processor” only and we must act under the instructions provided by NHS Digital (as the “controller”) when verifying your identity. To see NHS Digital’s Privacy Notice and Terms and Conditions, please click [<https://digital.nhs.uk/services/nhs-care-identity-service-2>]. This restriction does not apply to the personal information you provide to us separately which is managed in accordance with our Privacy Policy.

## Contacts, Notices & Revisions

If you have any concern about privacy at Solcom Limited or want to contact one of our data controllers, please contact us with a thorough description and we will try to resolve the issue for you. Further, the data protection officer for the above-mentioned data controllers can be contacted directly or through Solcom Limited.

If you suspect that a breach of data confidentiality has occurred you should notify us immediately and it will be handled in accordance with our internal data protection policies. You also have the right to complain to your local Supervisory Authority or the Information Commissioner’s Office.

For privacy related issues such as reporting a data breach please contact our data protection officer at [privacy@solcom.com](mailto:privacy@solcom.com) and for all other issues contact our helpdesk at [support@solcom.com](mailto:support@solcom.com) or by phoning 01983 817000

Our business changes constantly and our Privacy Notice will change also. You should check our website frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.