



One St Peters Road, Maidenhead, Berkshire SL6 7QU

Apodi Healthcare Limited - Privacy Notice

(Issued: 21 May 2025)

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1. Who are we?

Apodi Healthcare provides independent healthcare services to the NHS (on behalf of the NHS) in GP settings, patients' homes and NHS hospitals.

The types of services Apodi provides are outpatient clinic services, patient support programmes and homecare nursing. Apodi services are delivered by a range of healthcare professionals including NMC Registered Nurses and Healthcare Assistants. All Apodi staff are trained to ensure safe delivery of the services being provided, meeting all regulatory and statutory requirements.

Service Type – Community Healthcare:

Regulated activities

• Treatment of disease, disorder or injury

This includes outpatient clinic doctor and nurse consultations, physical examinations, and health assessments related to rheumatology, oncology, dermatology, gastroenterology, ophthalmology, gene therapy, haematology, rare diseases, neurology and cardiology.

• Diagnostic and screening procedures

These include blood and urine tests, ECG monitoring tests and analysis, and respiratory function analysis.

The clinic staff and healthcare professionals who provide you with care and support about your health condition maintain records about your health. These records help Apodi Healthcare to provide you with the best possible healthcare.

2. Protecting your data - The Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation

Protecting data has always been a priority for Apodi Healthcare and we are committed to protecting the privacy and security of your personal information and our ongoing data protection management in our healthcare service. We regularly review and improve our policies, processes, and systems in line with the requirements of the DPA 2018 and UK GDPR as we continue to make data protection a priority. Apodi has registered with the Information Commissioner's Office, registration numbers: Apodi Limited (Z1114021) and Apodi Healthcare Limited (ZA001657). Where this notice refers to 'Apodi', it covers both Apodi Limited and Apodi Healthcare Limited.

When you give us your personal information, we take steps to ensure that it is treated securely. Any information we hold about you in electronic format is held securely on a patient data compliant computer system.

3. Where do we get your information from?

We receive your information from many sources to deliver our services to you and we collect and process personal information about you from these sources.

- **Referring establishment** - NHS hospital, GP or others involved in your care.
- **From you** – when you complete our enrolment/consent form, contact us, when we visit you as part of a patient support and nurse programme or hold a video conference appointment with you.
- **Healthcare Professionals** – Consultants, Nurses, Therapists and other healthcare professionals when they visit you to provide a service they will gather information from you which is noted on your patient record [and/or clinician evaluation form]
- **Laboratories** – as part of any medical blood testing results.

- **Social care and Safeguarding Agencies** – to enable us and them to carry out our legal obligations for patient safety and care.
- **Other people** – another person you have authorized to act on your behalf. We will also hold their minimal personal information on your patient record.
- **Parent, Guardian or Responsible Person** – assigned and recorded to act on behalf of a paediatric patient (infants, children and adolescents) or someone who lacks capacity.

4. What information do we collect from you?

We collect information when you register as a new patient at Apodi Healthcare, and you complete an enrolment/consent form and answer some questions about your personal health. Once you see an Apodi Nurse or Doctor during your appointment, they will either update your medical records directly on the local NHS system and/or create a medical record on the Apodi patient management system (where you are receiving ongoing support from the Apodi Healthcare professional).

The personal information we collect includes:

- Basic details about you such as your name, date of birth, and gender
- Contact information including your home address, email address, contact telephone number(s) and emergency contact details.
- If you have attended an Apodi Healthcare appointment in the past, we will have a record of that previous contact.
- Medical information specifically about your personal health. This includes information about your past medical history, any current medicines you are taking, and a short description of the health problem that you are experiencing. Any results, correspondence etc., and a record of your appointment will be added to your hospital patient notes.

It is essential that your details are accurate and up to date. Please inform us of any changes as soon as possible.

5. Using your personal data: purposes and legal basis

We primarily use your personal information in the following ways:

- Create and maintain a record of your care and treatment and to communicate with your referring establishment (e.g. NHS hospital, GP etc.).
- Facilitate a nurse or healthcare professional to visit you at home, or to conduct a virtual appointment via video conference or telephone call.
- Answer any questions or concerns you may have and provide customer support.
- Provide regular reminders to you in accordance with your treatment and understand your level of engagement with your treatment through statistical and monitoring information.
- Provide remote care, using technology platforms as required for your service (e.g. Teams, AccessAnywhere etc).
- To enable the use of medical devices to monitor your health, e.g. ECG monitoring at home
- To enhance staff safety, we utilize secure audio and location devices that may be activated in emergency situations.
- Where you have emailed Apodi Healthcare we will keep a copy of the email or extract the contents of the email into your patient record.

We may also use your information for service improvement/health and safety purposes such as:

- To train our staff in providing services to you.
- To manage, investigate and resolve any issue you may have (incidents, complaints etc.).
- To record and manage (where appropriate) any adverse events or side effects relating to your medication that you tell us about.
- To capture information regarding an incident to ensure the safety of our employees.
- To escalate concerns regarding you and your care to ensure you are safe.
- To enable the storage, archive and disposal of paper and electronic records.
- To help us to improve the quality of our services based on your feedback and to conduct patient engagement surveys. We may carry out the surveys by email or by phone and may send you a text message to direct you to the survey link.
- To keep an audit trail for the services we provide, e.g. system logs.
- We routinely produce pseudonymised reports for internal and external purposes. Pseudonymised means replacing your personal identifiable information, that may lead you to being identified. The information

cannot be identified without the use of additional information, known as a key and is reversible. We may also use anonymised data for statistical and Monitoring purposes. Anonymised data means that individuals cannot be reidentified.

The personal information we collect from you and the lawful basis for us to process your information are detailed below:

Type of Data	Why do we need this data	Our lawful basis for processing
Personal data - Name, contact details and address - NHS number - Date of Birth - Gender - Next of Kin details: Name, contact telephone number, address and relationship	To enable us to provide Healthcare or treatment on behalf of the referring establishment/centre. To provide Appointment Reminders via SMS/Text for certain projects (e.g. Patient Support Programmes) to improve attendance rates	Article 6 (A) Consent The individual (you) has given clear consent for Apodi Healthcare to process their personal data for a specific purpose. Article 6 (F) Legitimate operational interest Non-personal identifiable information to help Apodi Healthcare fulfil its operational and contract requirements. Contact information to improve appointment attendance rates in relevant projects Article 6 (D) Vital Interest The processing, if necessary, to protect an interest which is essential to life of the data subject Article 6 (E) Performance of a task 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
Special Category data - Medical Indication/history - Health Information - Pregnancy information - Medication - Known allergies - Information about your mental and physical wellbeing	To enable us to provide Healthcare or treatment on behalf of the referring establishment/centre. Pharmacovigilance Reporting (patient safety) To provide a baseline assessment against which we can measure our services	Article 9 (A) Explicit Consent The individual has given explicit consent for Apodi Healthcare to process their personal data for a specific purpose. Article 9 (H) Health and Social Care The processing is necessary for the provision of health or social care or treatment of the management of health or social care systems and services or pursuant to contact with a health professional.
Pseudonymised (personal information which has been replaced and can only be identified using a key) & Anonymised data (Non identifiable information)	Statistical and monitoring reports, performance and sales reports: This data is locked so a person cannot be identified from the strands of data.	Article 6 (F) Legitimate operational interest Non personal identifiable information to help Apodi Healthcare fulfil its operational and contract requirements.

Consent and compliance with the NHS National Data Opt Out System

Special category data is personal data which relates to your more sensitive information, such as your healthcare records. Where consent is required for Apodi to process both personal and sensitive personal data, it must be explicitly given. This means that where we are asking you for sensitive personal data, we will always tell you why and how the information will be used.

You may withdraw consent at any time by emailing the Apodi DPO using this email address: DPO@apodi.co.uk. This means we will no longer collect or update the personal data we hold about you, but we may be required to retain your records in line with legal or regulatory requirements. Further details relating to your circumstances will be provided

when you withdraw your consent.

NHS National Data Opt Out System (NDOOS):

Apodi complies with the NHS National Data Opt Out System, as we:

- Have no data disclosures requiring opt outs to be applied.
- Only process medical information based on consent (or other section 6 / section 9 exemption); therefore, this data is exempt from the NHS NDOOS.
- Update the healthcare record in the relevant NHS patient system, which manages the patient's choice relating to the NHS NDOOS centrally against their NHS number.

6. Who has access to your information?

The confidentiality and protection of your personal information is of paramount importance to us. When we share your personal information we are doing so because it is essential to enable Apodi Healthcare to provide a service to you.

- **Apodi Healthcare Staff** -in the performance of their duties to provide the service to you. Every member of staff who works for Apodi Healthcare has a legal obligation to keep information about you confidential. Our staff include medical practitioners, registered nurses, managers, and administration staff.
- **Apodi Healthcare Associates** – an integral part of the Apodi Healthcare team delivering services to you. They work under the same requirements as Apodi Healthcare Staff, outlined above.
- **Referring establishment** (NHS consultants, GPs and other health professional) - on whose behalf we deliver services. Your medical information may be shared with other healthcare specialists as deemed appropriate by your referring consultant if they feel that you would benefit from seeing a further health specialist. Such healthcare specialists may be based within the National Health Service (NHS) or at an independent healthcare provider. However, this will only be done after your consultant has explained this to you and only if you give your consent to do so.
- **Professional service providers** - our IT database host who help us run our business.
- **NHS.net** – secure email provider for communications with the NHS and providing access to relevant NHS systems.
- **Dispense and Delivery Partners** – partner organisations that support Apodi Healthcare in the delivery of specific service contracts, e.g. Homecare, Dispensary, Delivery Couriers etc
- **Medical Device Partners** – partner organisations that support Apodi Healthcare in the delivery of service specific contracts through the provision of medical devices, e.g. ECG Monitoring using AliveCor KardiaMobile 6L Device. Our partner organisations do not typically have access to your health data in an identifiable format and would only need this to resolve technical issues with the system at the request of Apodi Healthcare. Anonymised outputs from devices may be used by our partner for quality assurance and to develop the functionality of devices. These are not attributable to individual patients.
- **Regulators** - Care Quality Commission, Information Commissioner's Office, Medicines and Healthcare Products Regulatory Agency.
- **Auditors** - external or internal as part of our performance reporting or compliance with legal / regulatory obligations.
- **Pharmaceutical Companies** – in a pseudonymised format which does not identify a specific patient.

In Section 3 “Where we get your information from” we have detailed the sources from which we may receive personal information about you, but we also share your personal information with the same sources, including limited partners and suppliers who work on Apodi Healthcare's behalf.

We do not sell or rent your personal information to any third parties outside of Apodi Healthcare. We do not share your information with any third parties for marketing purposes.

7. How we keep you information safe

In order to deliver a service to you we collect lots of personal and sensitive information about you, and we take keeping your data safe very seriously. To accomplish this, we:

- Use enhanced technology and security to control how your data is stored, accessed and secured.
- Test our systems regularly to ensure weaknesses are identified and rectified.
- Maintain Cyber Essentials Plus certification which is a set of technical controls we comply with to protect ourselves against common online security threats.
- Operate role-based access control which means users' access to your personal information is limited dependent on the task they carry out as part of their role with Apodi Healthcare.
- Train all our staff annually in the best ways of handling personal data confidentiality and the strict policies and procedures they must follow to ensure security is kept to a high level.

8. Sending data to other countries

In the majority of cases, your data will not be processed out of the UK.

In certain, limited circumstances, your data may be transferred to countries that are not part of the UK or European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA.

Alivecor ECG Monitoring

If you are receiving ECG Monitoring using the Alivecor KardiaMobile 6L Device as part of our KISQALI Monitoring Programme, our medical device partner, AliveCor, may transfer some personal data to members of the AliveCor group in the USA using appropriate intra-group agreements, which ensures that all data from EU/UK citizens is processed in a manner which is compliant with UK GDPR

Pharmacovigilance Reporting

If you experience an adverse reaction to your treatment, we are required to report this to the pharmaceutical company who manufactures the medication – known as Pharmacovigilance Reporting. This will usually include pseudonymised information about you as the patient (e.g. initials, date of birth and gender) and details of your reaction to the treatment. Apodi Healthcare will ask whether you consent for your name and contact information to be shared, so that the pharmaceutical company can follow up with you to find out more about the issue you have experienced.

As global companies, some of the pharmaceutical companies we work with have teams and partner organisations (third-party data processors) based across the world. They may use these teams to support their pharmacovigilance reporting procedures, data storage and analysis. If so, they are required to take additional steps in order to ensure that your personal data are treated just as safely and securely in those locations as they would be within the UK, under our Data Protection Legislation

- They should ensure the following safeguards are applied to such transfers:
 - They only transfer your personal data to third countries whose levels of data protection are deemed 'adequate' by the Information Commissioner's Office.
 - They use specific contracts with external third parties that are approved by the Information Commissioner's Office and European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#).
 - Where they transfer your data from the UK to a team or third party based in the US additional steps have been taken to ensure your personal data will be treated as securely and safely as it would be in the UK and under the GDPR. They check whether or not the US-based organisation is certified to the UK extension to the EU-US Data Privacy Framework. If not, they continue to rely on signed Data Processing Agreements with their data processors based on model contract clauses provided by the Information Commissioner's Office and European Commission (also known as 'standard contract clauses'), which impose suitable data protection standards on a contractual basis.
 - They have Binding Corporate Rules in place to ensure that all teams at their own office locations handle personal data in line with the data protection requirements in the UK and EEA.

The country will vary based on which pharmaceutical company is involved; if you have any questions or concerns about the transfer of your data outside the UK, please contact us at info@apodi.co.uk or Telephone: 01628 500895:

9. Your rights

We will ensure your rights are respected. You have the right to:

- Be informed - we will tell you what we do with your information. We do this through notices like this.
- Rectification - we will correct any personal information if it is inaccurate or rectify any data that is incomplete.
- Object- you have the right to object to how we process your information. Your objection will be considered in relation to your particular situation. We will stop processing unless there is a legitimate reason for us not to e.g. we need to process your data to provide you with safe care. If you would like to raise an objection about how we process your information write/email our Data Protection Officer at the address below.
- Restrict processing - we will temporarily restrict processing your data, whilst we check the information, if you query the accuracy of it. We will also restrict processing (if you raise an objection to how we process your data) whilst we consider your objection.
- Access – you can ask for copies of information we hold about you. This is called a subject access request. See below.

10. How you can access your information

You have the right to make a request to Apodi Healthcare for a copy of the information that we hold about you. If you would like a copy of some or all of your personal information please ask us by writing or emailing us at:

Data Protection Officer: Lynne Swift

Address: Apodi Limited
One St Peters Road
Maidenhead
Berkshire
SL6 7QU

Email: dpo@apodi.co.uk

We must respond to your request within one month of receiving it.

We want to make sure that your personal information is accurate and up to date and are very happy to remove or amend any information that you think is inaccurate.

If you would like a copy of the medical information we hold about you, we may need to ask you some additional questions about your reasons for requesting the information. Medical information is known as special category data under UK GDPR regulations, which means we have to take additional care when handling or disclosing this data.

11. How long we keep your information for

We will only hold your information for as long as it is needed to enable us to provide a service to you and in line with our retention schedule, which is aligned with the NHS Code of Practice, legal and regulatory guidance. If you would like further details, please get in touch using the contact details above.

12. Use of “cookies”

The Apodi Healthcare website at <http://www.apodi.co.uk/healthcare-professionals-and-patients/> uses cookies. A ‘cookie’ is a small piece of data that is stored on your computer’s hard drive by a website. They collect statistical data about your browsing actions and patterns and help us improve the way in which our website operates. When you visit our website, a Cookies and Privacy box will be presented to you, where you can choose to customize the cookies that are set on your device. Further information about cookies and how we use them can be found in the privacy notice on our website: <https://www.apodi.co.uk/privacy-policy>

You may also refuse the use of cookies by selecting the appropriate settings on the Internet browser of your computer; however please note that if you do this you may not be able to use the full functionality of the Apodi Healthcare website.

The Apodi Patient Management system does not utilise cookies.

13. Guidance and further reading

- Codes of practice for handling information in health and care.
 - <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care>

- <https://www.nhsx.nhs.uk/information-governance/>
- Guide to the UK General Data Protection Regulation (UK GDPR)
 - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>
 - <https://ico.org.uk/for-the-public/>
- NHS National Data Opt Out Service:
 - <https://digital.nhs.uk/services/national-data-opt-out>
- The EU General Data Protection Regulation (EU GDPR)
 - <https://gdpr.eu>

14. Update and Review

This privacy notice will be reviewed in line with Apodi document management processes. Any changes made to the notice as a result of review will be communicated to all Apodi Healthcare staff without delay and will be shared with patients at the earliest opportunity.

Last Reviewed and Updated: May 2025