

# PRIVACY NOTICE (TIER 4)

## Document Control

Reference: GDPR REC 4.1

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## 1. Privacy notice

### 1.1 Who are we?

Dr Ian Wilson provides regulatory and non-regulatory medical assessment services, including authorised aeromedical services for the UK Civil Aviation Authority, Irish Aviation Authority, other EASA National Aviation Authority's, the Federal Aviation Administration, and the Civil Aviation Safety Agency.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- [dpo@drwilson.co.uk](mailto:dpo@drwilson.co.uk)
- +44 7590 575576

The personal data we would like to collect and process on you is:

<b>Personal data type:</b>	<b>Source</b> (where Dr Ian Wilson obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Name, Email Address, Phone Number	Yourself & Bookeo.com
Residential & Postal Address	Yourself
Doctor's Name & Address	Yourself & your regulator
Employer and Employment Details	Yourself & your regulator
Photo Identification Document/s	Yourself
IP Address	Bookeo.com; Drwilson.co.uk
Details of booked appointments	Bookeo.com
National Aviation Authority Identifiers	Yourself & your Regulator/s
Specific Sensitive Health & Medical Data	Yourself, your Regulator/s, other Medical Professionals authorized by you

The personal data we collect will be used for the following purposes:

- To organize appointments for services you require
- To positively confirm your identity
- To request and receive payment from you for services provided by us
- To carry out medical assessment services contracted by you
- To access personal and health data held by your Regulator
- To provide your Regulator with your personal and health data
- To make regulatory and non-regulatory assessment decisions
- To inform your Regulator of regulatory assessment decisions
- To refer you to your Regulator's Medical Advisor/s
- To obtain assessment advice, from third party Medical Specialists
- To refer you, at your request, to third party Medical Specialists
- To communicate with you, in relation to your contracted services
- To communicate with you, in relation to regulatory matters
- To communicate important changes in our business or services to you

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Our legal basis for processing for the personal data:

- Consensual Processing- for Aeromedical & Regulatory Medical Assessments
- Contractual Obligations- to provide the services you request from us
- Legal Obligations- there may be legal obligations of regulatory nature

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To request and receive payment from you for services provided by us
- To take action to recover monies due from non-payment for services provided

The special categories of personal data concerned are:

- Health Data
- Data concerning a natural person's sex life

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### 1.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Dr Ian Wilson to process both types of personal data, but it must be explicitly given. 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 contacting Dr Ian Wilson, in writing, or by email to [dpo@drwilson.co.uk](mailto:dpo@drwilson.co.uk).

### 1.3 Disclosure

Dr Ian Wilson will pass on your personal data to third country parties after first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

<b>Third country (non-EU)/international organisation</b>	<b>Safeguards in place to protect your personal data</b>	<b>Retrieve a copy of the safeguards in place here:</b>
Federal Aviation Administration	The Privacy Act of 1974	<a href="https://www.faa.gov/privacy/">https://www.faa.gov/privacy/</a>
Civil Aviation Safety Agency	Privacy Act 1988	<a href="https://www.casa.gov.au/privacy-policy">https://www.casa.gov.au/privacy-policy</a>

### 1.4 Retention period

Dr Ian Wilson will process personal data for up to seven years after the last contracted services provided to you; and will store the personal data for at least ten years after your death, leaving the European Union, or until the data is requested by and returned back to the Data Controller concerning regulatory matters, e.g CAA, FAA, CASA.

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### 1.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Dr Ian Wilson refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 1.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Dr Ian Wilson (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Dr Ian Wilson's data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Data Protection Officer (DPO) contact details</b>
Contact Name:	CAA Data Controller	Dr Ian Wilson
Address line 1:	Aviation House	International House
Address line 2:	Gatwick Airport South	Chester Hawarden Airport
Address line 3:	West Sussex	Chester
Address line 4:	RH6 0YR	CH4 0GZ
Address line 5:		
Email:	external.response@caa.co.uk	dpo@drwilson.co.uk
Telephone:		+44 7590 575576

Dr Ian Wilson  
International House, Chester Hawarden Airport  
Flint Road, Chester, CH4 0GZ

## 1.7 Privacy statement

Read more about how and why we use your data here:

<http://ame.drwilson.co.uk/privacy>

## 2. Online privacy statement

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### How we use your information

This privacy notice tells you how we, Dr Ian Wilson, will collect and use your personal data for providing regulated and non-regulated medical assessment services; complaints; appointments; *[outline further information on services and activities that you collect personal data, for example: cookies, profiling, complaints, subscriptions, etc.)]*

### Why does Dr Ian Wilson need to collect and store personal data?

In order for us to provide you regulated and non-regulated medical assessment services we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes Dr Ian Wilson would contact you for additional consent.

### Will Dr Ian Wilson share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Dr Ian Wilson in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Dr Ian Wilson's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

### How will Dr Ian Wilson use the personal data it collects about me?

Dr Ian Wilson will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for

longer than is necessary. Dr Ian Wilson is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Dr Ian Wilson contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Dr Ian Wilson at your request, can confirm what information we hold about you and how it is processed. If Dr Ian Wilson does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Dr Ian Wilson or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Dr Ian Wilson accepts the following forms of ID when information on your personal data is requested: Passport, Photographic Driving License, Birth Certificate

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Contact details of the Data Protection Officer / GDPR Owner:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact Name:	Dr Ian Wilson
Address line 1:	International House
Address line 2:	Chester Hawarden Airport
Address line 3:	Chester
Address line 4:	CH4 0GZ
Address line 5:	
Email:	<a href="mailto:dpo@drwilson.co.uk">dpo@drwilson.co.uk</a>
Telephone:	+44 7590 575576

### **Document Owner and Approval**

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff and is published in the practice documents folder.

Signature:



Date: 07/05/2018

### **Change History Record**

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Dr Ian Wilson	07/05/2018

Dr Ian Wilson  
International House, Chester Hawarden Airport  
Flint Road, Chester, CH4 0GZ