Privacy Policy

1. Introduction.

This privacy policy sets out the way Mastercall Healthcare process your personal information. It deals with how we collect information, what we do with it, how we protect it and what controls or rights you have.

We are committed to protecting the privacy of our patients and anyone who interacts with us and will treat all information you give us with care.
We promise to:

- Tell you why we collect personal information, how we do this and what we use it for.
- Only collect the information we need to deliver the service to you.
- Keep the personal information up to date and ensure it is safe and secure.

Please read this Privacy Policy carefully to understand how we process your personal data. By providing your personal data to us or by using our services or this website you are accepting or consenting to the practices in this Privacy Policy.

We may change this policy from time to time. The date this policy was last updated is shown at the end of this document.

As a data controller, we fully comply with the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003, the UK General Data Protection Regulations (UKGDPR) and the Data (Use and Access) Act 2025. We will also comply with all applicable clinical confidentiality guidelines.

We are recorded on the ICO Data Protection Register under registration number Z9315209

2. Who we are.

In this policy references to ‘Mastercall Healthcare’ or ‘Mastercall’ refers to

Mastercall Healthcare
International House
Pepper Road
Stockport
SK7 5BW
Registered Company: 05224356

Mastercall Healthcare is a not for profit provider of primary care, urgent care and dental helpline services across Greater Manchester, Cheshire and Merseyside.

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3. What information we collect.

We collect personal information about you to enable us to provide the services or fulfil a role with us. This may include:

- Name and address (including location data when taking part in virtual consultations over the internet/application), marital status, family history and details of any lasting power of attorney
- Email address and telephone numbers.
- The country you live in, your gender, date of birth, national insurance number, passport number and where relevant the language you speak.
- Details of your employment.
- The name and contact details of your next of kin. It is your responsibility to ensure that if you provide us with any information about another person that they are aware of the terms of this privacy policy.
- Details about associated people eg children, partners, carers and relatives.
- From your parent or guardian if you are under 16. This may include details of any educational establishment you attend.
- Recordings of telephone calls or video calls we receive or make (Please note. In relation to virtual/video consultations, the visual element of the consultation (and any photographs) via the internet/telephony application are not recorded/stored by Mastercall although the audio element is, as with all standard telephone calls).
- Your photograph and photographs for treatment and care (e.g sent by email or other means)
- Your photograph/photographic id/proof of address documents.
- Details of services and treatments you may have received from us.
- Reports or notes on your health or any treatment and care you have received or need.
- Patient information, feedback and treatment outcome information, you provide.
- Information about complaints and incidents.
- When you visit our website, we collect information about your IP address and pages you visit. This does not tell us who you are or your address, unless you choose to provide that information.
- Information from customer surveys or promotions that you take part in.

We will also collect Special category data – sometimes called sensitive personal information. This may include:

- Information about your race, ethnic origin and religion.
- Information about your physical or mental health, genetic data or biometric data.
- Information about your sex life or sexual orientation.
- Information about risk and safeguarding.

4. How do we collect Personal Information?

We collect the personal information in the following ways:

- When you enquire about one of our services or treatments.
- When you provide information by filling in a form on registration or information provided at any other time.

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- When you correspond with us by email, phone or other ways.
- During the course of the provision of services to you.
- Contact us by email, telephone, social media or in any other way.
- When you visit our website.
- Fill in a form or survey for us.
- Information from emergency services, local authority and other public organisations.
- From video and sound recordings in our vehicles
- Information from third parties including business partners, service providers, technical sub-contractors, payment and delivery services, advertisers when you have given permission to share it with us
- From publicly available services to keep your information up to date for example the NHS national data base or GP connect.
- When you participate in discussion forums or other social media on our site or sites managed by us.
- When you take part in a social event
- When you take part in a competition, promotion or survey

5. Personal Information Provided by other Sources

We may collect personal data about you from other sources and these can include:

- From your next of kin or other family member.
- Provided by doctors, other clinicians and health care professional, hospitals, clinics and other health care providers (including ambulance services).
- Your employer when they provide information.
- Translators and interpreters.
- Information from a Local Authority or the Police.
- Any health professional or organisation who provides information for the continuity of your care, including any shared care records/local data sharing agreements. This may include access to your full GP medical record where this has been set up by your GP practice.
- The Greater Manchester Care Record (where appropriate).

  For more information on the Greater Manchester (GM) Care Record please see https://healthinnovationmanchester.com/thegmcarerecord/.

  The privacy notice for the GM Care Record can be found at https://healthinnovationmanchester.com/the-gm-care-record-privacy/.

  GP Connect:

  We also use a facility called 'GP Connect' to support your direct care. GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patient care, leading to improvements in both care and outcomes.

  GP Connect is not used for any purpose other than direct care.

  Authorised Clinicians such as GPs, NHS 111 Clinicians, Care Home Nurses (if you are in a Care Home), Secondary Care Trusts, Social Care Clinicians are able to access the GP records of the patients they are treating via a secure NHS Digital service called GP Connect.

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The NHS 111 service (and other services determined locally e.g. some services provided by Mastercall and other GP practices in a Primary Care Network) will be able to book appointments for patients at GP practices and other local services.

Legal basis for sharing this data
In order for your Personal Data to be shared or processed, an appropriate "legal basis" needs to be in place and recorded. The legal bases for direct care via GP Connect is the same as the legal bases for the care you would receive from your own GP, or another healthcare provider:

- for the processing of personal data: Article 6.1 (e) of the UK GDPR: "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".
- for the processing of "Special Category Data" (which includes your medical information): Article 9.2 (h) of the UK GDPR: "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services".

Your rights
Because the legal bases used for your care using GP Connect are the same as used in other direct care situations, the legal rights you have over this data under UK GDPR will also be the same- these are listed elsewhere in our privacy notice.
Find out more about GP Connect.

6. How we use the information and why we need it.

We use the personal information to provide the direct health, or social care services to individual patients and to meet our contractual commitments. This may include:

- **Processing –** this will include using the information to fulfil any request made by you or someone on your behalf to receive one of our health or care services or receive an email newsletter

- **Contract –** if we have a contract with you we will process your personal information to fulfil that contract.

- **Consent –** generally we will only ask for your consent to process your personal information if there is no other legal ground to process. Where we need your consent, we will ensure you are as fully informed as possible and use that consent solely for the reason you have given it to us. You will be able to change your mind at any time by contacting us at the address in section 17. Any email or text to you will have a link to let you do so.

- **Public interest task–** we will process your personal information when carrying out the performance of a task in the public interest which includes the provision of direct health care or social care. This also includes processing personal information for medical research, trials and to train and educate health care professionals.

- **Necessary for the purpose of preventative or occupational medicine –** to assess whether you are able to work, the provision to you of health or social care, a medical diagnosis, or the management of health and social care systems.

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- **Necessary to defend legal claims or a court action.**

- **Vital interests –** where it is necessary to protect your vital interests or those of another person.

- **Public interest –** this is usually in line with any applicable laws such as protecting against dishonesty, malpractice or other seriously improper behaviour.

- **Information you have made public.**

- **Marketing –** in addition to processing we will use your personal information to provide you with information about services you have requested or would reasonably expect to receive from us. You will be able to change your mind at any time and we will keep your preferences up to date. Any email to you about marketing will have a link to let you unsubscribe.

- **Automatic decision making and Profiling –** we may make use of automatic decision making and profiling and screening methods to provide a better service to patients. Automatic decision making assists us to deliver more effective services. Profiling helps us target resources more effectively through gaining an insight into the background of patients and helping us build relationships that are appropriate to their needs. The use of automatic decision making or profiling will not result in a denial of services.

7. Legitimate interests

Mastercall Healthcare also processes your data when it is in our legitimate interest to do this and when these interests do not override your rights. These legitimate interests include: -

- Sharing information when requested by another organisation because they need it for their public task or official function.
- Sharing information when required for national security, to protect public security or for defence.
- When necessary to respond to or deal with an emergency situation.
- To prevent, detect or investigate crimes, including the apprehension and prosecution of offenders.
- Safeguarding, when it is necessary to protect the physical, mental or emotional well-being of an individual at risk.
- providing you with information on services products and feedback.
- Keeping our records up to date.
- For statistical research and analysis and to enable us to monitor and improve services.
- To monitor how we are meeting our clinical and non-clinical performance in the case of health care providers.
- Sharing your personal information with people or organisations in order to comply with any legal or regulatory obligations or to enable us to run our organisation.
- To fulfil laws that apply to us and the third parties we work with.
- To take part in or be the subject of any merger
- Managing our relationships with you and third parties who assist us to provide the services to you.

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8. Who will see the information?

Everyone working for Mastercall Healthcare has a legal duty to keep information about you confidential. Similarly, anyone who receives information from us has a legal duty to keep it confidential. We will never sell your information or let other organisations use it for their own purpose. Your information will only be accessible to our staff where it is appropriate in respect of the role they are carrying out.

We will only share your personal information:

- If consent is necessary, we will have taken your consent to us doing so and will provide information for the specific reason your consent was given. You will have the opportunity to withhold consent when you complete the form on which we collect the data or you can do so by contacting us at the address in section 17, at any time.

- Doctors, clinicians, hospitals, community healthcare providers, diagnostic and treatment centres (including pharmacy's) and other health and social care providers to provide our services and continuity of health care to you. This also includes processing personal information to enable organisations to carry out research, medical trials and processing personal information to train and educate health care professionals.

- Your GP – where clinically necessary we will share your information with your GP. You can ask us not to do so however a 'best interests' decision will be made by the consulting clinician. You should be aware it may be detrimental to your health if your GP does not have your full medical history.

- The Greater Manchester Care Record (where appropriate).

  For more information on the Greater Manchester (GM) Care Record please see https://healthinnovationmanchester.com/thegmcarerecord/.

  The privacy notice for the GM Care Record can be found at https://healthinnovationmanchester.com/the-gm-care-record-privacy/.

- GP Connect is an NHS England service that allows authorised health and social care professionals to securely share and access patient GP records in real time for direct patient care. You can opt out of sharing your health information with GP Connect but this could affect the ability of health and care professionals to treat you.

- First responders, ambulance service, undertakers, coroner and care homes.

- Where it is necessary to protect your vital interest (i.e. your life or health)

- Other organisations you belong to, to confirm your entitlement to our services.

- Organisations or people who by law or regulations we must share your personal information with. This can be national data bases, screening registers government authorities and NHS organisations.

- The police or other law enforcement agencies to assist them to perform their duties if we must do this by law or under a court order.

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- Social Care Services, Education Services, Local Authorities and Voluntary and Private Sector providers working with the NHS.

- Where we use other organisations to provide services to us or on our behalf for processing, mailing, delivering, answering patient's questions about services, sending mail, messages and emails, data analysis, assessment and profiling or processing credit/debit card payments.

- To organisations who you have requested us to supply information so that they can provide services or products you have requested.

- Organisations providing IT systems, IT support and hosting in relation to IT systems on which information is stored.

- When using auditors and professional advisors.

- With our affiliate companies and subsidiaries.

- Any Primary Care Network (PCN) we work with and the individual member GP Practices.

- When we are legally required to, or because of a lawful request by a governmental or law enforcement authority.

- If we merge with another organisation or form a new entity.

Where a third-party data processor is used, we ensure they operate under a contract which includes confidentiality and security of personal data and their obligations under the Data Protection legislation.

We will not disclose any information that identifies you to anyone outside of those providing your care without your express permission unless there are exceptional circumstances, such as;

- When there is serious risk of harm to yourself or others

- The duty to share your information outweighs the obligation of confidentiality

- There is a permission granted under div 251 of the NHS Act 2006(1)

- A court issues an order to release your information

- Where there is another statutory or legal basis for disclosure.

9. How the NHS and care services use your information (National Data Opt-Out)

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information is not needed.

Sometimes, for research and planning your confidential patient information will be needed. You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out, your confidential patient information will still be used to support your individual care.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can change your mind about your choice at any time.

Mastercall Healthcare is compliant with the national data opt-out policy.

You can also find out more about how patient information is used at: https://www.hra.nhs.uk/information-about-patients/ (which covers health and care research); and https://understandingpatientdata.org.uk/what-you-need-know (which covers how and why patient information is used, the safeguards and how decisions are made).

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

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10. Security.

The security of your personal information is very important to us. We protect all personal data we hold and ensure we have appropriate organisational and technical measures in place to prevent unauthorised access or unlawful processing of personal data and to prevent data being lost, destroyed or damaged.

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We primarily process personal data within the United Kingdom, However, in limited circumstances, personal data may be accessed from within the European Economic Area (EEA) by authorised people working remotely. In addition, some of our service providers who support our IT systems and infrastructure may process or store personal data outside of the EEA. Where this occurs, we ensure appropriate safeguards are in place to protect personal data in accordance with UK data protection law.

You might find links to third party websites on our website. These websites should have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

11. Artificial Intelligence (AI)

What is Artificial Intelligence?

Artificial Intelligence refers to the development of computer systems that can perform tasks that typically require human intelligence. These tasks include visual perception, decision making, speech recognition and translation between languages.

Further information on AI and its use in healthcare is available at:

https://transform.england.nhs.uk/information-governance/guidance/artificial-intelligence/

Our Use of AI:

Mastercall are trialling an ambient AI scribe tool to support consultations. The tool uses ambient voice technology and generative AI to automate the process of drafting consultation notes.

How it works:

1. During a consultation, the ambient AI scribe tool listens to the conversation.
2. It then drafts notes based on what was discussed.
3. The clinician reviews, edits, and approves these notes before they are added to the patient's electronic health record.

Benefits:

The use of ambient AI scribe tools allow clinicians to work more efficiently, allowing them to devote more time and attention to patient care.

Security:

We have completed thorough safety checks to ensure the technology is secure. All patient confidential data is processed in secure environments and no patient identifiable data is retained by any third parties after the consultation notes are reviewed, edited and stored within the patient record by the clinician.

12. Your rights.

You have the following rights:

- Transparency over how we use your personal information (right to be informed).
- To request a copy of the personal information we hold about you, which will be provided to you within one month (right of access).
- An update or amendment of the personal information we hold about you (right of rectification).
- To ask us to stop using personal information (right to restrict processing).
- Ask us to remove your personal information from our records (right to be forgotten).
- Request us to remove your personal information for marketing purposes (right to object).
- To obtain and reuse your personal data for your own purposes (right to portability).
- Not to be subject to a decision based on automated processing.

You can contact to us about any of these rights at the address in section 17. To protect your privacy, we may ask you to prove your identity before we agree to respond to any request. There is no charge for a request and we will respond to the request within one month.

If you are not satisfied with the way in which we deal with your request you can contact the Information Commissioners Office on 0303 123 1113 or at their website www.ico.org.uk.

13. Complaints

You can make a data protection complaint about the way in which we have handled your personal information. You can do this by contacting us at the address in section 17 or by email at mahe.dataprotrectionofficer@nhs.net. On receipt of your complaint we will:

- Acknowledge your complaint within 30 days.
- If necessary ask you for information to confirm your identity or for more information about the complaint.
- Make appropriate enquiries or investigation about the complaint you have raised.
- Inform you of our enquiries and respond to your complaint.

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14. Cookies.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website or make use of e-billing services.

- **Analytical/performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

  The Mastercall website uses Google Analytics, to record and analyse how visitors use the website.

  "This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site.

  The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above."

- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

15. Retention of information.

We hold your information only for as long as necessary for each purpose we use it. We use the

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following guidelines: -

- Any time limits set by law or recommended by regulators, professional bodies or associations. Eg NHS Records Management Code of Practice for Health and Social Care 2023
- Time limits for making a claim.
- For as long as we have a reasonable need for managing our relationship with you or running our organisation.

16. CCTV

Our premises are monitored by CCTV for the safety of visitors and staff. Images are retained for 18 days and in accordance with ICO guidelines.

17. How to contact us.

If you have any questions about this privacy policy or your rights regarding processing your personal information, or wish to make a complaint please contact:

Data Protection Officer
Mastercall Healthcare
International House
Pepper Road
Stockport
SK7 5BW

mahe.dataprotectionofficer@nhs.net
0161 476 0400

18. Further Information

The Information Commissioner is the UK's independent regulatory body set up to uphold information rights. For further information please visit the Information Commissioner's Office (ICO) website at https://ico.org.uk/

Contact Details:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Tel 0303 123 1113

This policy was last updated on 16.7.26

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