

PRIVACY NOTICE

What is the purpose of this document?

Imperial College of Science, Technology and Medicine (the “**College**” or “**Imperial**”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation the Data Protection Act 2018 and the General Data Protection Regulations (the “**GDPR**”) and the College’s Data Protection Policy.

The College is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

This Notice applies to EAS FHSC National Lead Investigators and Lead Investigators who opt-in to participate in the development of the public-facing worldwide web-based directory of lipid clinics, now referred to herein as “FindMyLipidClinic.com”.

The purpose of FindMyLipidClinic.com is to freely provide a worldwide directory of lipid clinics for website visitors targeted at patients, potential patients and their relatives with dislipidemias. Your participation would involve us using the information that you provide and consent us to use for the sole purpose of developing the FindMyLipidClinic.com.

This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time.

It is important that you read this Notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Information protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We shall collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title and personal email addresses, and details of your clinics including addresses, telephone numbers, email addresses and services available that you provide to us and consent us to use.

We shall strictly not collect, store and use any "special categories" of more sensitive personal information about you whatsoever.

How is your personal information collected?

We shall collect personal information about you and your clinics together with your consent to use this information for the sole purpose of registering your clinics on FindMyLipidClinic.com, by email communication.

How we will use information about you and the legal basis for processing your personal data under the GDPR

We shall only use your personal information when the law allows us to. We shall use your personal information in the following circumstance:

The information that you provide and consent us to use will be utilised for the sole purpose of the development of FindMyLipidClinic.com.

Situations in which we will use your personal information

We need all the categories of information in the list above (see The kind of information we hold about you) for the sole purpose of the development of FindMyLipidClinic.com.

If you fail to provide personal information

If you fail to provide certain information when requested or the information that you provide is incomplete or inaccurate, then this may halt your participation in the development of FindMyLipidClinic.com.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Personal Information sharing

The information that you provide and consent us to use will be utilised for the sole purpose of the development of FindMyLipidClinic.com, which will be freely available to the general public when it goes live. This is to serve the purpose for which the information that you will

provide and consent was originally intended.

Third parties that may receive your information in this case refers solely to FindMyLipidClinic.com visitors.

We anticipate that FindMyLipidClinic.com will be visited by individuals located on a global level (both inside and outside of the EU/EEA) since the nature and purpose of FindMyLipidClinic.com is to freely provide a worldwide directory of lipid clinics.

Why might you share my personal information with third parties?

The nature and purpose of FindMyLipidClinic.com is to freely provide to its visitors the details of your clinics through a worldwide directory, with your consent. Your information will strictly not be shared with third parties by any other means, except where required by law or where we have another legitimate interest in doing so.

Which third-party could access my personal information?

"Third parties" includes third-party FindMyLipidClinic.com visitors only. We anticipate that FindMyLipidClinic.com visitors will originate from both inside and outside of the EU/EEA, since the nature and purpose of this online directory will be freely available worldwide.

How secure is my information stored on FindMyLipidClinic.com viewed by Third Parties?

The server hosting FindMyLipidClinic.com where your information will be stored has been security verified following routine penetration tests from external hacking prevention services. We are also required to take appropriate security measures to protect your personal information in line with our policies.

Data security

We have put in place measures to protect the security of your information.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Personal Information retention

How long will you use my information for?

FindMyLipidClinic.com intends to hold your information indefinitely on the lipid clinics directory or until either your lipid clinics are no longer open to patients, by which you must notify us of such closures, or you send us a request to remove such information from the directory in writing for any other reason, if any.

Details of retention periods for different records the College holds are available in our retention policy which is available on this website:

<http://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/records-and-archives/public/RetentionSchedule.pdf>.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "information subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. We shall strictly not use your personal information for any marketing purposes whatsoever.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact us in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

July 2020

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

Should you provide your written consent for the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this Privacy Notice, please contact the Information Protection Officer at:

Imperial College London
Information Protection Officer
Exhibition Road
Faculty Building Level 4
London SW7 2AZ

e-mail: dpo@imperial.ac.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for information protection issues.

If you have any questions about how we handle your personal information, please contact us at:

EAS FHSC Coordinating Centre
Imperial Centre for Cardiovascular Disease Prevention
Department of Primary Care and Public Health
Imperial College London
Reynolds Building Level 3
London W6 8RP

e-mail: coordinator@eas-fhsc.org

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.