



Buchan + Associates Limited

Privacy Policy

2024/2025

Version control:

V0.1 – May 2023 – policy reviewed; no updates

V0.2 – May 2024 – policy updated with new logo/template; no policy updates

Policy Statement

At Buchan + Associates Limited (B+A Ltd) we are committed to protecting and respecting your privacy. We (B+A Ltd) recognise that when you choose to provide us with information about yourself or your organisation, you trust us to act in a responsible manner. We believe this information should only be used to help us provide you with a quality service.

This Privacy Policy (together with terms and conditions and any other documents referred to in it) sets out the basis upon which any personal information we collect from you, or that you provide to us, will be processed by us.

If you use our website, www.buchanassociates.com, you are providing consent to the processing of any information you provide to us, in accordance with clauses within this Privacy Policy.

Company Responsibility

B+A Limited is a Private Limited Company registered in Scotland, company registration number SC241674, and our registered office is:

First Floor
227, West George Street
Glasgow
G2 2ND

The Director responsible for Data Privacy and Security on behalf of B+A Limited is Mr Iain Buchan, Managing Director.

How we collect your personal information

Through the operation of our website, including any 'cookies' that are active, we may collect and process the following information about you:

- details of your visits to the website, including but not limited to, location data, traffic data and other communication data and the resources that you access;
- information that you provide by filling in forms on our website;
- information provided if/when you report a problem with our website; and
- information provided when you contact us through our website, or information collected by us through your emails or any other communications with us, however it is made.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

When you provide personal information to us, or we collect personal information from other sources, we will treat that information in accordance with this Privacy Policy.

Healthcare Data

B+A Limited is a Data Processor for personal healthcare data supplied by and processed on behalf of our clients, with whom we have a contract of engagement.

UK General Data Protection Regulation (UK:GDPR) Article 6, paragraph 1 (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child;

GDPR Article 9, paragraph 2 (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Legitimate Interests

B+A Limited has carried out a 'legitimate interest' assessment which concludes:

The processing of information relating to individuals who have had interactions with healthcare providers, including but not restricted to, hospitals and GP services, is required to achieve its 'legitimate interest' in providing consultancy services to healthcare providers.

This consultancy service will aim to improve decision-making around the provisioner-provision of existing and future healthcare infrastructure and service requirements; and that the nature of the data being processed, and the purposes for which it is being used, are considered to be low risk.

Any small risks will be mitigated by appropriate safeguards and controls.

How we use your information

The information that we receive, collect or store relating to you is primarily used to enable us to provide our consultancy services to you. We may also use personal information provided by you, or gathered by us, for the following purposes:

- to provide any services and related products requested by you;
- to recommend services, and related products, that we believe will be of benefit/interest to you;
- to provide information on our activities, and those of our partner organisations, such as promotional materials and general updates relevant to you;
- to carry out duties and obligations arising from any contracts entered into between B+A Ltd and yourselves;
- to notify you about changes to our services, products or website;
- to process and respond to any specific information you may request;
- to respond to any enquiries or complaints received from you;
- to update our records;
- to process payments;
- to facilitate audit purposes;
- to prevent or detect fraud; and
- to enable third parties to carry out any of the purposes above on our behalf

How we use healthcare data/information

The healthcare data we collect from NHS organisations is used for the following purposes;

- to facilitate contractual obligations we have to yourselves;
- to observe trends in past and current facility activity volumes so as to assist in planning for future healthcare requirements and provision;
- to analyse patient flows in within healthcare facilities; and
- to establish performance benchmarks to provide evidence and information relating to best practice

Storing your information

Unfortunately, the transmission of information via the internet is not completely secure; although we will do our best to protect your personal information, we cannot guarantee the security of any information that is sent to us electronically over the internet. Therefore, the transmission of any such information is entirely at your own risk.

Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

Any device upon which your information is stored will be compliant with our Cyber Essentials accreditation;

Data/information will only be stored for the purposes for which it was provided; When we have finished using your data, and any project-related activities have been concluded, we will remove your data from our systems, in line with statutory/audit requirements.

Disclosing your information

We may share your personal information with third parties in the following ways;

- we will release your personal information when we are required to do so for legal or regulatory purposes or as part of legal proceedings;
- we may share information you have provided with supply chain partners/sub-contractors if it is deemed necessary to fulfil our contractual obligations to you; and
- we may disclose your personal information to any member of our company.

We will not pass your information to third parties for marketing purposes if you have indicated that you do not want us to do this at the point where you submit your information on our website.

Your rights

You have the right to ask us not to process your personal information for marketing purposes. We will inform you before collecting your information if we intend to use your information for such purposes, or if we intend to disclose your information to any third party for such purposes.

You can exercise your right to stop such processing by selecting the appropriate options on the forms we use to collect your information. You can also exercise the right at any time by contacting us by post at:

Buchan + Associates Limited, First Floor, 227 West George Street, Glasgow. G2 2ND

Our website may, from time to time, contain links to and from the websites of our supply chain partners and affiliates.

If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

We cannot identify you in the healthcare data we obtain from any NHS organisation. Any requests relating to your healthcare data should be addressed to the NHS healthcare provider with whom you are registered, or who provided healthcare services to you.

Access to information

You have the right to request a copy of the personal information we hold about you and to access that information and require it to be corrected if it is inaccurate.

We will ask for confirmation of identity before we disclose any personal information to you.

If the quantity of information requested is significant, we reserve the right to charge a fee. Any such fee will be advised ahead of the request being carried out.

Updates

We may update this Policy periodically, and the latest version will always be available on our website.

Contacting us

If you have any questions, comments or requests about this Privacy Policy please contact:

Post: Buchan + Associates Limited, 227 West George Street, Glasgow. G2 2ND

Email: info@buchanassociates.com

Or use the contact form on our website: www.buchanassociates.com

Date Reviewed: May 2024

The person responsible for updating this policy is:

Iain Buchan,
Managing Director

Next Review Date: May 2025