

KFM Privacy Notice Statement

Introduction

KFM is a provider of healthcare support services. The purpose of KFM is to partner with and support healthcare providers in providing world class patient care, with all profits and cost savings reinvested in the NHS.

KFM provides an end-to-end managed service, covering all clinical areas & specialities including procuring and supplying all clinical supplies, medical equipment plus maintenance, training and technical support and outpatient pharmacy dispensing services.

KFM are legally known as KCH Interventional Facilities Management LLP. We are a wholly owned subsidiary of King's College Hospital NHS Foundation Trust and we do not have any private sector investors. This means that any surplus that we make is invested back into the NHS and is not paid out to shareholders.

This Privacy Notice applies to all KFM Services that 'control' and 'process' data.

As part of the services we offer, we are required to process personal data about our staff and service users. "Processing" can mean collecting, recording, organising, storing, sharing or destroying data.

We are committed to being transparent about why we need your personal data and what we do with it. This information is set out in this privacy notice. It also explains your rights when it comes to your data.

Our contact details

Name: King's Facilities Management (KFM)

Address: Unit 1, 129 Coldharbour Lane, London, SE5 9NY, United Kingdom

Phone Number: 0203 299 7878 E-mail: kch-tr.ask-kfm@nhs.net

The type of personal information we collect

So that we can provide a safe and professional service, we need to keep certain records about you. We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (e.g. name and contact details)
- Financial details
- Training records

We do not collect sensitive information (also known as <u>special categories</u> of information) except when individuals specifically knowingly provide it and therefore have consented to this.



How we get the personal information and why we have it

Most of the <u>personal information</u> we process is provided to us directly by users for one of the following reasons:

- Registration of new staff
- Completion of any Forms where users specifically knowingly provide it and therefore have consented to this (i.e. MS Forms)
- Purchases or use of our services (i.e. placing an order)
- Completing a contact form via our KFM Website
- Signups to newsletters or following us on social media (i.e. LinkedIn, twitter)

We use the information that individuals have given us for the purpose of:

- Account set up and administration
- Providing goods and services
- Internal communications
- Internal research and development purposes (improvement of customer and user experience)
- Processing of queries
- Meeting internal audit requirements

We will not:

- sell or rent your data to third parties
- share your data with third parties for marketing purposes

We will share your data if we are required to do so by law – for example, by court order, or to prevent fraud or other crime.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent.

The individual has given clear consent for KFM to process their personal data for a specific purpose. You are able to remove your consent at any time. You can do this by contacting our KFM Service Desk (FAO Governance Team) at kch-tr.ask-kfm@nhs.net

(b) We have a contractual obligation.

The processing is necessary for a contract KFM has with a supplier, or because they have asked KFM to take specific steps before entering into a contract.

(c) We have a legitimate interest.

The processing is necessary for a legitimate purpose of the business (i.e. for KFM to be able to provide a service or function).



How we store your personal information

We are committed to doing all that we can to keep personal data secure. To prevent unauthorised access or disclosure we have put in place technical and organisational procedures to secure the data we collect – for example, we protect your data using varying levels of encryption.

We take appropriate steps to ensure that we only record and store personal data which is relevant, that it is accurate and up-to-date and kept for an appropriate length of time.

All KFM employees, volunteers and contractors with access to personal data have a responsibility to maintain confidentiality to ensure that it is only used for the benefit of the business, and we ensure relevant training or agreements are in place where appropriate.

KFM has a Corporate Records Policy which follows the <u>NHSE Corporate Records Retention</u> <u>Schedule guidelines</u>.

Your data protection rights

Under data protection law, you have rights including:

Your right of access

You have the right to ask us for copies of your personal information.

Your right to rectification

You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing

You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability

You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.



The lawful basis for your processing can also affect which rights are available to individuals. For example, some rights will not apply:

	RIGHT TO ERASURE	RIGHT TO PORTABILITY	RIGHT TO OBJECT
CONSENT			BUT RIGHT TO WITHDRAW CONSENT
CONTRACT			*
LEGAL OBLIGATION	*	*	*
VITAL INTERESTS		*	*
PUBLIC TASK	*	*	
LEGITIMATE INTEREST		*	

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us via our KFM Service Desk (FAO. Governance Team) at kch-tr.ask-kfm@nhs.net if you wish to make a request.

Associated Documents

KFM Website - Privacy Policy
KFM IG Policy
KFM Corporate Records Policy

KFM IG Confidentiality & Data Protection Policy

KFM IG Information Security Policy

For external customers – in order to view our policies, please request access via the links, with a response time of 5 working days.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us via our KFM Service Desk (FAO Governance Team) at kch-tr.ask-kfm@nhs.net.

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:

Information Commissioner's Office

Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

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