

## Keeping things crystal clear

Our contract with you essentially means we act as your agent to fulfil prescriptions for appliances under the FP Agency Scheme. To keep things clear, we've updated and reissued our Data Protection Statement in line with General Data Protection Regulations (GDPR).

This short guide describes how we manage process and secure the data we use to meet our contractual obligations.

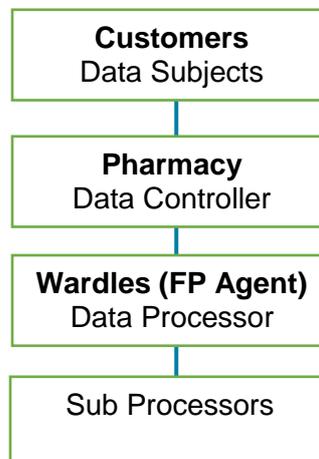
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### 1. Contractual position

For the purposes of the GDPR our arrangements are structured as follows:

- each Pharmacy is a Data Controller of both Personal Identifiable Data (**PID**) and Sensitive Personal Identifiable Data (**SPID**) contained in a prescription which is collected by each Pharmacy from its customers
- Wardles, as your FP Agent, is a Data Processor
- Wardles uses a number of service providers to assist in the delivery of its service which are classed as Sub-Processors for the purposes of the GDPR

This diagram outlines the relationships under the GDPR:



## 2. The Information we process

Most of the information which we process will be provided to us by you or your staff in connection with their use of our service – so you're in control of the information which we process. We may process the following information about your staff and your customers:

- names of staff and staff contact details including email addresses, phone number and postal address
- your customers' names, addresses, dates of birth, details of their GP and information about your customers' health and medication which is all derived from a prescription

## 3. Why we process this information

We will process this information for the following purposes:

- to provide our FP Agency Scheme to you and to dispense appliance prescriptions for your customers to you including:
  - processing staff, customer and prescription information
  - to register your account with us
  - the fulfilment, tracking and delivery of orders for products and prescriptions which you submit to us
- to monitor the use of our service and to fix any issues which affect our service
- to respond to any messages which you send to us and deal with any complaints which we may receive
- to comply with any legal and regulatory requirements which apply to us and to comply with any legitimate requests from regulatory bodies
- to prevent crime and fraud and to comply with any legitimate requests which we receive from law enforcement and crime prevention agencies
- to create and maintain records required for the operation of our business
- to fulfil our contractual requirements with the NHS. We will need to share information with the NHS Business Services Authority to negotiate and check the accuracy of our payments with the NHS and to ensure that we maintain appropriate professional and service standards and that your declarations and ours are accurate

## 4. Who we share information with

We will share the information which we process about your staff and your customers with:

- Our service providers including Cegedim Rx Limited whom we use for our PMR system to process prescriptions, DPD Group UK Ltd (trading as DPD) who are our courier partner and Alliance Healthcare Limited and Royal Mail who we use to distribute products and mail
- Crime prevention and law enforcement agencies and regulatory bodies and any other person who has the lawful right to request and receive it
- NHS Business Services Authority to negotiate and check the accuracy of our payments with the NHS

## 5. Where information is stored

We are based in the UK and our service providers are based in the UK. We do not share your information with anybody outside the EU.

We and our service providers take reasonable steps to keep your information secure including the use of firewalls, encryption and other technical and physical measures in our IT systems to minimise the risk of unauthorised access to or use of your staff and customers' information which is processed by us or our service providers.

## 6. Wardles and GDPR

Wardles takes its responsibility for information security and Data Protection very seriously. In response to GDPR, Wardles has reviewed and improved its processes and controls where considered appropriate. In particular, we have:

- revised our terms and conditions to clarify our contractual position under the GDPR and to give you the rights you require under the GDPR to respond to the exercise by any of your customers of their rights as data subjects under the GDPR. They also give you a right to audit our compliance with GDPR. They also set out a process for responding to any security incidents which may occur. Our revised terms and conditions are attached to this Statement
- introduced a number of changes to our business process to improve transparency and security:
  - if you send prescriptions to us by post or courier, we will not be able to process your order if you do not send to us a completed Prescription Audit Form. This form provides a clear audit trail for both of us of the prescriptions, and hence PID and SPID, which you have sent to us. For EPS prescriptions we will maintain a record of all prescriptions we download from the NHS spine on your behalf.
  - we will send to you an acknowledgement email when we receive your Prescription Audit Form and prescriptions by post or courier. If you do not receive an email from us confirming receipt, then the Prescription Audit Form and prescriptions will not be deemed to have been received and accepted by us for processing. In these circumstance, you should contact Royal Mail or the courier used to send the Prescription Audit Form and prescriptions to us
  - in the event that we are unable to process a prescription, or we can only process part of a prescription, we will return the prescription to you with a completed Prescription Audit Form so that you have a clear audit trail of the prescriptions we are sending back to you. We will either send the prescriptions back to you via Royal Mail or courier (using a tracked or signed for facility) or with our distribution partner, Alliance Healthcare Limited. We have audited the processes used by Alliance Healthcare Ltd and have signed them off for compliance with GDPR.

## 7. Communication to your Customers

We would recommend that you amend your Privacy Notice or Statement you have in place for your customers to make it clear to them that, for the provision of appliances, you utilise and send on their prescriptions to Wardles who act as your agent to dispense these prescriptions. The statement should make it clear that Wardles are a data processor for the purposes of GDPR. We have provided you with the information you will need for your own Privacy Notice or Statement in paragraphs 1 to 5 of this Statement.



**8. Updates**

If we make any significant changes to the way in which we process your staff and customers' information, we will update this notice and send it to you.

**9. Contact us**

If you have any questions about the information in this guide, please contact us at [DPO@bestwaymedhub.co.uk](mailto:DPO@bestwaymedhub.co.uk)

# WARDLES

Dispensing Appliance Contractors

Part of



**BESTWAY MEDHUB**

**Revised Terms and Conditions**