

Prof. M Sim DATA PRIVACY POLICY

This data privacy policy sets out how Prof. M Sim uses and protects the information you give us. Prof. M Sim is registered with the Information Commissioner's Office and has a nominated Data Controller. Prof. M Sim is committed to ensuring that your privacy is protected, and that your information will only be used in accordance with this privacy statement.

Legal Framework

The General Data Protection Regulations (GDPR) came into force in the UK on 25th May 2018. This policy is effective from that date. In GDPR terminology, an individual is referred to as a data subject. The people collecting, processing, and retaining the individual's data are also specified by terms in GDPR which the CAA's legal department has interpreted as follows: in the context of aircrew and ATCO medicals, the CAA is the data controller and the individual AMEs who are appointed by and report to the CAA (Prof. M Sim) are data processors. All AMEs, including Prof. M Sim, sign an agreement with the CAA to this effect. Under the CAA's AME T&C (para 39) the AME must have a privacy notice available to applicants before, during and after their data is collected. This document is posted on our website and linked in booking emails in fulfilment of that requirement.

The information we collect about you:

- Your name, address, email address and phone number
- Copies of your driving licence and/ or passport (and thus information about your nationality and date and place of birth)
- Your occupational health and medical information.
- Your employment as entered on your medical applications.
- Your SOLI (State of Licence Issue).
- Occasionally your bank details (only in the context of refunds).
- Occasionally other information relevant to customer care (e.g. patient satisfaction surveys)
- Occasionally data from personal health apps and hardware which you release to us.

Why we collect your information and what we do with it:

In general, we use your data to facilitate your application for an aviation medical certificate. Specific purposes embedded in this general framework include:

- Liaising with national aviation authorities
- Responding to your customer inquiries.
- Booking and carrying out your periodic medical examinations.
- Clarifying your aircrew fitness status between periodic medical examinations.
- Improving our products and services.

We are also obliged to maintain accurate clinical records by the General Medical Council's principles of Good Medical Practice, as well as by the CAA's and FAA's regulations.

How we store your data:

We keep a record of application forms, clinical findings, audiograms, optometry forms including CAA Med162s, ECGs, ECG reports including CAA Med108s, blood tests, radiology results, urine testing results, external expert reports and GP records - and any other data which are necessary to help you with your goal of aviation medical certification. We only keep paper records until your application has been completed. Records are then scanned to PDF.

All PDF files are stored on encrypted computers, drives and servers which are password protected. All computers and drives are kept in safe storage when not in use.

Why we retain your data:

1. So that we can assist you with renewal medicals, and changes in SOLI, and general medical queries, and casework between medicals.
2. Because we, or you, may be audited by the CAA.
3. Because we are required to pass your data to the CAA when we cease trading and/or retire from AME work.

How we respect your rights under GDPR:

1. We are registered with the ICO and have a named Data Processor
2. We will only use your data for the purposes indicated above.
3. We do not use your data for reminder emails or marketing.
4. We carry out DPI (data protection impact) assessments whenever new legislation or technology appears.
5. We do not pass your data to anyone else for any reason (including marketing) with the sole exception of the national aviation authorities (CAA and FAA) and then only in proportion to the requirements of certification and flight safety.
6. We will notify you (as well as the ICO) if your data is ever compromised.

Requesting a copy of your records or asking us to pass your records to someone else.

To release your data to you we require a written, signed request backed up with unexpired passport confirmation of your identity. To release your data to someone else, we require a written, signed request backed up with unexpired passport confirmation of your identity.

Cookies

A cookie is a file which is placed with your consent on your computer's hard drive. Cookies allow web applications to respond in an individualised fashion, allowing the web application to tailor its operations to you by gathering information about your preferences and remembering them.

We use traffic log cookies to analyse data on our web page traffic to improve our website for customer needs. More information about cookies used, their purpose and how long they are stored can be found on the [cookie declaration](#) page. You can change or withdraw your consent from this page at any time.

Links to other websites.

Our website may contain links to other websites. When you click a link on our site, you will be given a pop-up alert that you are leaving our site and should take steps to ensure the security of the site you are heading to. Please be aware that we have no control over websites other than our own. You should therefore satisfy yourself on the security of sites linked to ours, as you would in general.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

You may request details of personal information which we hold about you under the Data Protection Act 2018 and other pertinent legislation. If you would like a copy of the information we hold on you, please write to: Prof. Malcolm Sim, The Hub, 3 Earl Haig Rd, Hillington, Glasgow G52 4JU noting the identification requirements above.

If you believe that any information we are holding on you is incorrect or incomplete, you can ask us to correct it. If you would like to update or correct the information we hold on you, please write to: Prof. Malcolm Sim at the above address, noting the identification requirements above.

You also have the right under GDPR to ask to:

- Delete your data
- Limit how your data is handled.
- Oppose the use of your data
- Transfer your data to another legal entity.

Please be aware that if there is a legal or ethical obligation which overlaps these rights, ViA will respond by stating that the action would be illegal or unethical and refuse to execute your request. By way of example, it is clearly not possible to delete your data if we are required by law to keep it for the aviation authorities, or to refuse to pass it on to the aviation authorities if we felt there was a public safety issue. For this reason, it may be more effective for you to write directly to the CAA which, as mentioned above, is classified as the Data controller in the context of aviation medicals performed by individual AMEs. The contact email is medicalweb@caa.co.uk, and you should quote your CAA Reference Number.

Right to complain

If you have concerns or wish to complain about any aspect of our data handling please contact Prof. Malcolm Sim at the above address. If you believe that your data is not being processed in accordance with applicable law, you have the right to complain to the Information Commissioner's Office.

Prof. Malcolm Sim 27th March 2024