# London School of Hygiene and Tropical Medicine Occupational Health Service Privacy Notice

# 1. About this Privacy Notice

London School of Hygiene and Tropical Medicine ("LSHTM", "we" "us", or "our") respects your privacy and is committed to protecting your personal data.

Please read this notice carefully – it describes why and how we collect and use personal data in the context of LSHTM's provision of an Occupational Health Service and provides information about your rights under data protection laws.

This Privacy Notice applies to personal data provided to us either by individuals themselves or by third parties in the course of us providing the Occupational Health Service. It should be read in conjunction with the following documents:

- For existing LSHTM staff: LSHTM Privacy Notice for Staff
- For existing LSHTM students: LSHTM Privacy Notice for Students
- LSHTM's other Privacy Notices
- LSHTM's Data Protection Policy

We keep this Privacy Notice under regular review. We may withdraw or modify this Notice at any time and we may supplement or amend it by reference to additional policies and guidelines from time to time. Any changes we make to this Privacy Notice in the future will be posted on the relevant pages of the LSHTM external website, the LSHTM Health and Safety intranet pages, and communicated through The Chariot newsletter and in e-mail communications to students. We may also notify you in other ways from time to time about the processing of your personal data in connection with the Occupational Health Service.

This Privacy Notice was created on 30 April 2021.

# 2. <u>Who is this Privacy Notice for?</u>

This Privacy Notice is primarily directed towards users (or '**Clients**') of the LSHTM Occupational Health Service. Clients may include the following categories of individuals:

- LSHTM employees (current and previous)
- Appointed employment applicants/'new starters' joining LSHTM as a new employee
- LSHTM students (current and previous)
- Visiting academic or research staff, honorary staff and secondees

• Contractors, consultants and temporary/casual workers

In addition, and incidental to personal data relating to individuals in the above categories, LSHTM may process limited personal data concerning the following:

- Emergency contacts/next of kin provided by any of the categories of individuals listed above
- Relevant healthcare professionals (e.g. General Practitioners) of any of the categories of individuals listed above.

### 3. <u>What is 'personal data'?</u>

Legally, 'personal data' is defined as "any information relating to an identified or identifiable natural person".

Personal data therefore includes any information, in recorded form, from which it is possible to identify you as an individual and which 'relates' to you as an individual. In other words, it is information which allows you to be distinguished from other individuals <u>and</u> allows LSHTM or a third party to record or learn something about you as an individual or where our or a third party's use of that information impacts on you as an individual (e.g. it allows us or a third party to make decisions about you). In most cases, the same pieces of information both identify you and relate to you e.g. your name, date of birth and gender identity, can both distinguish you from other individuals and tells us/allows us to record something about you as an individual.

Personal data does <u>not</u> include information which does <u>not</u> relate to an identified or identifiable individual, or to personal data rendered anonymous in such a manner that the individual is not or no longer identifiable.

'Special categories of personal data', such as information about racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs, trade union membership, physical or mental health, sex life and sexual orientation, are given a high level of protection under data protection law.

#### 4. LSHTM's Data Protection Obligations

LSHTM is a controller of personal data, as defined in the UK General Data Protection Regulation (UK GDPR), because it chooses how and why it collects and processes personal data of staff, students, research participants, alumni, visitors and other individuals. This means that we are legally responsible for the personal data we collect and hold about you, as a Client, in the context of providing the Occupational Health Service at LSHTM.

One of our responsibilities as a controller is to tell you about the different ways in which we use your personal data – what information we collect (and our lawful basis for doing so), why we collect it, where we collect it from and whether (and with whom) we will share it. We also need to tell you about

your rights in relation to the information. This Privacy Notice provides further details about all of these issues in respect of the Occupational Health Service at LSHTM.

#### 5. <u>Personal data that we may process about you</u>

The types of personal data we may process in the course of providing the LSHTM Occupational Health Service may include the following:

- Basic personal identifiers e.g. your name, contact details, address(es), etc
- Your date of birth
- Your gender identity
- Your relationship to LSHTM e.g. whether you are an employee, student, contractor, etc.
- Your job title and information relating to your employment e.g. Faculty/Department, whether academic or professional services, type of contract (full time or part time, permanent or fixed term), start date, end date (if applicable), name of line manager, etc.
- Information relating to your course of study at LSHTM (if relevant) e.g. Faculty/Department, student ID number, title of course, course supervisor, start and end date of studies, etc.
- Attendance history/absence information
- Information relating to your lifestyle, interests and extra-curricular activities
- Your General Practitioner name and address

In addition, LSHTM may also process some or all of the following, more sensitive 'special categories' of personal data, or data that is sensitive or private in nature for other reasons, about Clients of the Occupational Health Service:

- Personal data revealing racial or ethnic origin
- Personal data revealing religious or philosophical beliefs
- Personal data revealing trade union membership
- Biometric data
- Data concerning a Client's physical or mental health e.g. information relating to any disabilities, health or medical history, information relating to current health or medical issues, details of sickness absence, etc
- Data concerning a Client's sex life or sexual orientation
- Sensitive information relating to a Client's lifestyle, particularly when connected to that Client's health

• Other sensitive information relating to a Client's personal or social circumstances, particularly where those circumstances are or may be impacting on that Client's ability to work or study, or vice versa

#### 6. How we obtain personal data about you

LSHTM may obtain personal data about you from the following sources in the context of providing the Occupational Health Service:

- Via **automatic data feeds** from LSHTM's human resources and/or student information management systems to our occupational health and safety management system.
- From **you**, including via paper-based or electronic occupational health questionnaires, selfreferral forms, email, telephone, video-conferencing or face-to-face meetings with members of LSHTM's Occupational Health and Safety Department.
- From your current or prospective line manager/academic supervisor, including through preemployment forms, risk assessments (e.g. for jobs requiring health surveillance enrolment) and occupational health referral forms and questionnaires.
- From **LSHTM Human Resources** through pre-employment forms and occupational health referral forms and questionnaires.
- From LSHTM Registry/Student Support Services, for student records and referrals.
- From external third-party organisations or individuals (including regulated medical professionals) engaged by LSHTM for the purposes of providing medical services to you as part of the Occupational Health Service.
- From **individuals (including regulated medical professionals) employed by LSHTM** for the purposes of providing in-house medical services as part of any future move related to 'in-sourcing' the provision of the Occupational Health Service.
- Information created by LSHTM's Occupational Health and Safety Department in the course of providing occupational health services support to you or facilitating the provision of medical services to you.

#### 7. <u>Purposes for which we process your personal data</u>

The main purposes for which LSHTM may process personal data in the course of providing the Occupational Health Service include the following:

• Ascertaining your fitness to undertake work where there is an established fitness standard.

- Establishing baseline health records where you may be working with substances and agents which have the potential to cause disease.
- Monitoring your health if you continue to be exposed to workplace allergens or substances which may cause disease.
- Overseeing the monitoring of your health if required for your work with Ionising Radiation Sources.
- Advising on the management of accidents and exposures in the course of your work.
- Ascertaining your fitness to undertake work or study overseas, in line with the LSHTM Offsite Working Policy and recommending vaccinations and measures to protect your health as appropriate.
- Providing advice and support to you in the management of a work-related health problem or a health problem that affects you at work or in your studies.
- Within the established practice of medical confidentiality, providing advice to your line manager/academic supervisor on the management of work-related health problems or health problems that may affect you at work or in your studies.

LSHTM will only use your personal data for the purposes for which we obtained it (as summarised above), unless we reasonably consider that we need to use it for another purpose and that additional purpose is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so, or alternatively, seek your consent to us doing so. We may further process your personal data without your consent, in compliance with the above rules, where this is required or permitted by law.

# 8. <u>Lawful bases for processing personal data in the context of the LSHTM Occupational</u> <u>Health Service</u>

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Notice, including having a "lawful basis" for the processing. Where we process special categories of personal data, we are required to establish that we can meet an additional legal condition for processing that data.

We take our responsibilities under data protection laws extremely seriously, including meeting these requirements. The main lawful bases and legal conditions on which your personal data are generally processed in relation to LSHTM's Occupational Health Service are explained below.

Lawful bases relied on for data processing activities (for all personal data):

# (i) Processing is necessary for a contract LSHTM has with you, or because you have asked LSHTM to take specific steps before entering into a contract.

LSHTM Staff (including employees, 'new starters', visiting academic or research staff, honorary staff, secondees, contractors, consultants and temporary/casual workers): Where you have entered into an employment contract or another type of contract to perform work for LSHTM, we will process your personal data so that both parties can perform that contract.

This includes, for example (and with reference to the Occupational Health Service), managing our human resource processes (such as manging sickness absence and return to work) and providing advice and support to staff and/or LSHTM, as an institution, in relation to occupational health issues affecting individual members of staff.

#### LSHTM Students:

If you accept an offer to enrol as a student at LSHTM, you must accept our student terms and conditions. Once you have accepted these terms, it creates a contract between you and LSHTM. From that point onward, we process your personal data so that we can meet our contractual obligations to you and/or support you in meeting your obligations to us.

In relation to the Occupational Health Service, this includes, for example, managing attendance issues (such as sickness absence) and providing advice and support to students and/or LSHTM, as an institution, in relation to occupational health and related issues affecting individual students.

#### Pre-contractual steps:

In certain circumstances, we may process your personal data where you have requested us to take certain steps prior to us entering into an employment contract, or other form of work-related agreement, with you.

In relation to the Occupational Health Service, this may include, for example, preemployment health assessment for all new staff to ascertain fitness to work, identify any relevant medical requirements and enable any reasonable adjustments to be made, and to ensure that those individuals requiring health surveillance are notified upon commencing employment.

#### (ii) Compliance with a legal obligation to which LSHTM is subject

It may be necessary for LSHTM to process your personal data, in the context of the Occupational Health Service, to enable us to comply with statutory or other legal obligations, or to satisfy other legal or regulatory requirements, including where such processing is necessary:

- to enable LSHTM to discharge its statutory duties towards our staff, students and others under the Health and Safety at Work etc. Act 1974 and other laws, regulations and rules relating to health and safety;
- to enable LSHTM to fulfil our responsibility for the health assessment of staff (and, where necessary, students) as required by law, including, but not limited to, the Control of Substances Hazardous to Health (COSHH) Regulations 2002;
- to enable LSHTM's compliance with legal obligations (such as the duty to make reasonable adjustments for people with disabilities) that are imposed on LSHTM under the Equality Act 2010 and related legislation and rules;
- to enable for LSHTM to comply with its common law duties of care to its staff, either as employer or the organisation receiving the benefit of an individual's work, in relation to the health, safety and welfare of these individuals;
- to discharge our duty of care to students when delivering services, including the provision of pastoral support, and taking steps to protect the health, safety and wellbeing of students; or
- to enable LSHTM to comply with requirements issued by statutory or regulatory bodies, including the Health and Safety Executive and the Office for Students.

# (iii) Performance of a task carried out in the public interest or in the exercise of official authority vested in LSHTM

LSHTM may process personal data in the course of providing its Occupational Health Service where we reasonably consider that such processing is necessary for the performance of a task carried out in the public interest and that task has a clear basis in law.

This will arise, for example, in respect of any services that are provided as part of the Occupational Health Service but which are *outside of those that are necessary* for the performance of contractual obligations, the taking of pre-contractual steps, or in order to comply with specific legal obligations placed on LSHTM (as described above).

We will also rely on this basis for processing personal data relating to emergency contacts/next of kin of Clients of the Occupational Health Service.

LSHTM's Royal Charter empowers us to perform certain functions to operate as a higher education institution. These functions include "*promoting* … *research*… *and education in public health and tropical medicine and such other academic subjects as* [LSHTM] *may consider appropriate*".

LSHTM will therefore be processing personal data outside the contractual and/or legal obligation context, in its capacity as a public authority, in order to facilitate the

performance of its core purposes of research and education, as laid down by law, and its responsibilities to its staff, students and others in relation to these core purposes.

#### (iv) Consent

While we **do not** expect it to be the case, there may be some rare circumstances where we need to process your personal data outside the lawful bases set out above.

<u>If this happens</u>, we will seek your consent to process your personal data for that specific purpose. We will take all reasonable steps to ensure that any consent you provide is freely given (i.e. you have a genuine choice), specific, informed and unambiguous. We will explain to you how you can withdraw your consent at the time of you giving it. If you do withdraw consent, this will not affect the lawfulness of processing based on your consent before your withdrawal.

It is important to understand that references to 'your consent' in this Privacy Notice and other documents relating to LSHTM's Occupational Health Service **do not**, in general, refer to LSHTM relying on consent as a lawful basis for processing your personal data under the data protection legislation. This is because, as both a public authority and an employer – and in line with guidance from the Information Commissioner's Office – LSHTM endeavours to avoid the use of consent in order to lawfully process individuals' personal data and instead relies, wherever possible, on other lawful bases for doing so, such as those referred to above.

Legal conditions relied on for the processing of special categories of personal data:

#### (i) Employment law obligations and rights

In the course of providing the Occupational Health Service, LSHTM will process certain special categories of personal data relating to members of LSHTM staff (such as data concerning a staff member's physical or mental health). We shall do this in our role as an employer (or the organisation receiving the benefit of a staff members' work), where this is necessary in order for us to meet our obligations, or give effect to LSHTM's or an individual staff member's rights, in the field of employment law.

Examples of this are where processing special categories of personal data is necessary to enable LSHTM to meet our obligations as an employer under the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health (COSHH) Regulations 2002, the Equality Act 2010 and any other relevant legislation.

#### (ii) Substantial Public Interest

The data protection legislation allows special categories of personal data to be processed where this is necessary for reasons of substantial public interest, subject to certain conditions, restrictions and limitations.

When processing special categories of personal data (such as data concerning health) outside the employment context – i.e. in circumstances where the 'employment law' condition outlined above does not apply – LSHTM shall rely upon the specific 'substantial public interest' condition relating to '*statutory, etc and government purposes*'. This shall include the processing of special categories of personal data relating to individuals who are not (or no longer) LSHTM employees – including LSHTM students, visiting staff, contractors or consultants.

These statutory purposes include the following:

Statutory duties under the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health (COSHH) Regulations 2002, the Equality Act 2010, etc.

As previously described in this Privacy Notice, LSHTM may process personal data, including special categories of personal data, in the course of providing the Occupational Health Service, where this is necessary to fulfil our statutory duties under the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health (COSHH) Regulations 2002, the Equality Act 2010 and other relevant legislation.

The processing of personal data, including special categories of personal data, in this context is considered by LSHTM to be a reasonable and proportionate way for us to work towards fulfilling our statutory duties.

We also consider that there is a clear substantial public interest associated with higher education institutions complying with their statutory duties.

#### Public functions conferred by law

As a higher education institution incorporated by Royal Charter, LSHTM has public functions conferred on it which are laid down by law in connection with its core purposes of education and research.

Processing personal data, including special categories of personal data, in the manner and for the purposes described in this Privacy Notice, facilitates the performance of our core purposes of education and research, and enables LSHTM to fulfil our responsibilities to our staff, students and others in relation to these core purposes.

We also consider that being able to provide occupational health support to our staff, students and others, so that they may continue to perform the core purposes for which LSHTM was established will, in turn, give rise to further substantial public interest benefits, in the form of future research and educational outputs.

We would be unable to provide the Occupational Health Service and achieve each of the substantial public interest benefits set out in this section if we were unable to process special categories of personal data (e.g. data concerning health).

#### (iii) Public interest in the area of public health

We may, in certain circumstance, process special categories of personal data (including, for example, data concerning health) where this is necessary for reasons of public interest in the area of public health. This may include protecting against serious cross-border threats to health (such as COVID-19) and responding to new threats to public health (e.g. as a result of new research findings in relation to COVID-19 or new official public health guidance).

Where processing is necessary on this basis, we shall ensure that both LSHTM and any third parties with whom we may share personal data for these purposes are under and can fulfil a legal or professional duty of confidentiality to the individuals whose data are being processed.

#### (iv) Establishment, exercise or defence of legal claims

It may be necessary to process special categories of personal data relating to you for the purposes of establishing, exercising or defending legal claims. This includes processing necessary for the purposes of:

- actual or prospective court proceedings;
- obtaining legal advice; or
- establishing, exercising or defending legal rights in any other way.

This may include, for example, claims relating to alleged or actual breaches of LSHTM's legal obligations under health and safety legislation or the Equality Act 2010, as well as claims relating to accidents at work or industrial disease.

#### (v) Explicit Consent

Again, while we **do not** expect it to be the case, there may be some exceptional circumstances where we need to process special categories of personal data relating to you outside the legal conditions set out above.

<u>If this happens</u>, then as well as taking all reasonable steps to ensure that any consent you provide is freely given, specific, affirmative (via an opt-in, rather than opt-out) and unambiguous, and is able to be withdrawn at any time, we shall put extra measures in

place in order protect your rights and to ensure that the consent is 'explicit'. These extra measures will include some or all of the following:

- insofar as possible, explicit consent shall be confirmed in a clear statement, rather than by any other type of affirmative action;
- any consent requested will specify the nature of the special category personal data to be processed; and
- consent to process special categories of personal data will be separate from any other consents requested.

If you do withdraw your explicit consent, this will not affect the lawfulness of processing based on such consent before your withdrawal.

# 9. Sharing of your personal data within LSHTM

Personal data obtained by LSHTM in the course of us providing the Occupational Health Service may be shared internally at LSHTM, but only on a genuine 'need to know' basis so as to preserve the privacy of individual Clients of the Occupational Health Service.

**Please note that**, in line with the principles of medical confidentiality, no medical or clinical information relating to you (e.g. diagnosis, prognosis, results of tests, etc.) will usually made available to LSHTM by any occupational health or medical services provider, whether external or employed by LSHTM, without your informed consent (permission), subject to certain narrow exceptions. **This is due to professional requirements, separate to any requirements arising from the data protection legislation.** 

The following list below indicates the groups of people at LSHTM that may need to see medical or clinical information relating to you.

- LSHTM Human Resources
- Your line managers/academic supervisors
- Facility Managers/Laboratory Managers
- Safety Advisors/members of LSHTM's Occupational Health and Safety Department

Where specific health assessment processes are undertaken, information on the outcome of such assessments may shared internally to nominated individuals who have a genuine business need to know.

When sharing information internally as described above, LSHTM will ensure that the amount of information shared is kept to the minimum necessary for the relevant purpose.

#### 10. Third parties with whom we may share your personal data

It may be necessary for LSHTM to share your personal data with external third parties in the context of providing the Occupational Health Service. Examples of where this may be necessary are provided below:

#### • External providers of occupational health services

LSHTM may share your personal data with external organisations that we engage to provide occupational health services, as part of the overall service provision by LSHTM to Clients.

This includes our current provider, the Royal Marsden NHS Foundation Trust ("**Royal Marsden**"), to whom LSHTM has outsourced a range of services in order to facilitate the provision of the Occupational Health Service to you. Details of how Royal Marsden processes your personal data can be found in its privacy information here <u>https://www.royalmarsden.nhs.uk/privacy</u>

**Please note** that where a health professional, such as an occupational health advisor or physician, employed by an external organisation (or who is self-employed) provides you with regulated medical services, then that organisation (or individual), rather than LSHTM, will be the controller of any personal data processed by them for the purposes of providing those services.

# Third-party service providers – testing, treatment, therapeutic and other medical/clinical services or counselling services

In addition to Royal Marsden (or any replacement provider), LSHTM may share personal data relating to you with accredited organisations or independent practitioners who provide testing, treatment, therapeutic or other medical/clinical services, or counselling services, in each case, where it is necessary in order for you to receive the benefit of any of these services. This would routinely be done for appointment booking, billing and other administrative purposes.

This includes, without limitation:

- providers of pathology or diagnostic services
- travel clinics (e.g. in relation to travel advice/pre-travel evaluation)
- providers of counselling services
- o independent practitioners e.g. independent physiotherapists
- o alternative therapy providers

#### Third-party service providers – cloud-based software applications

We will share your personal data with third party service providers that help us provide our occupational health and safety information management systems – in particular, where those systems rely on cloud computing solutions. This includes Civica UK Limited, who provide our current system (known as "OPAS-G2"). This enables us to make the Occupational Health Service available to you in a way that is efficient and effective, and also assists us in keeping your personal data secure.

**Please note** that Civica UK Limited staff themselves do not routinely have access to your personal data contained in LSHTM's implementation of the OPAS-G2 system. On occasion, however, it may be necessary for LSHTM to grant access to certain personal data relating to Clients of the Occupational Health Service – for example, to investigate and remediate security incidents or to provide technical support and assistance, where required. Such occasions are expected to arise infrequently, and where they do, access to Clients' personal data will be coordinated on a case-by-case basis and subject to strict controls and restrictions.

#### • Statutory or regulatory bodies, executive agencies and local authorities

In certain circumstances, and where required or permitted by law to do so, we may share your personal data with statutory or regulatory bodies, government executive agencies and/or local authorities.

An example of such a body is the Health and Safety Executive.

#### • LSHTM's consultants and professional advisors

Depending on the circumstances, LSHTM may need to share your personal data with its consultants and other professional advisors, such as solicitors.

#### • Courts and tribunals

In the event that legal proceedings are issued – for example, in connection with alleged or actual breaches of LSHTM's relevant legal obligations, accidents at work or industrial disease – we may share personal data with the relevant courts and tribunals.

**Please note**: the list of third parties in this section is not exhaustive – data may also be shared in accordance with the privacy notices listed at section 1 above, as applicable.

#### 11. Transfers outside the United Kingdom

When we share your personal data with a third party as set out above, this may, in certain cases, involve transferring your personal data to a recipient outside of the United Kingdom. Where it is this necessary, and the recipient is in a country which the UK government has decided does not have adequate data protection laws, we will make sure that appropriate safeguards are in place to protect your information and your rights under applicable data protections laws.

### 12. Information security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

# 13. <u>Retention periods</u>

We will only retain your personal data for as long as necessary to fulfil the purposes for which we obtained it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

All personal data processed in the context of LSHTM's Occupational Health Service will be kept according to the LSHTM Records Retention & Disposal Schedule, or if no applicable time limit is specified therein, for a reasonable time.

Within a reasonable time after we no longer need to retain your personal data, we will take reasonable steps to remove it securely from our systems.

Please note that we may retain some anonymised or aggregated information in order to monitor our work in this area, but you will not be identifiable from this information.

#### 14. Your rights

Subject to certain conditions and exemptions, you have the following rights in relation to your personal data:

- **Right of access:** A right to access personal data held by us about you.
- **Right to rectification:** A right to require us to rectify any inaccurate personal data held by us about you.
- **Right to erasure:** A right to require us to erase personal data held by us about you. This right will only apply in certain circumstances e.g. where we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent <u>if we are using your personal data based on your consent</u>; or where you object to the way in which, or purposes for which, we process your data (in line with your right to object see below).

- **Right to restriction of processing:** A right to restrict our processing of personal data held by us about you. This right will only apply in certain circumstances e.g. where you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data on the grounds that our processing is unlawful, but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
- **Right to data portability:** A right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation. Again, this right will only apply in certain circumstances.
- **Right to object:** A right to object to our processing of personal data held by us about you. Again, this right will only apply in certain circumstances.
- **Right not to be subject to automated individual decision-making:** A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop (in practice, this right is highly unlikely to apply in the context of the processing activities to which this Privacy Notice relates– see section 15 below)

In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege), or otherwise as permitted by law.

If you wish to exercise any of the above rights, please contact us using the details set out at section 17 below.

Separately, If you wish to have access to information from your health record (if we are required to maintain one for you for health surveillance purposes under applicable legislation), you may do so by requesting a copy directly using the following e-mail address: <u>Occupationalhealth@lshtm.ac.uk</u>. **Please note** that, for security reasons, we will need to verify your identity before releasing information to you.

# 15. Automated processing

LSHTM does not use automated processing and decision making without manual intervention. This includes in relation to data received in the context of the LSHTM Occupational Health Service.

#### 16. Who regulates the use of my personal information?

LSHTM maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the data protection laws. Our registration number is Z7513362.

Please see the Information Commissioner's Office website (<u>www.ico.org.uk</u>) for further information.

#### 17. Who do I contact with questions?

LSHTM has appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal data, please contact the Data Protection Officer using the following contact details:

By E-mail: DPO@lshtm.ac.uk

**By Post:** London School of Hygiene & Tropical Medicine Data Protection Officer Keppel Street London WC1E 7HT

If we are unable to adequately address any concerns you may have about the way in which we use your personal data, you have the right to lodge a formal complaint with the Information Commissioner's Office. Full details may be accessed on the complaints section of the Information Commissioner's Office website.