

Patient Privacy Notice (CH)

Introduction

The following Privacy Notice explains how we, Sciensus AG (SHC), Sciensus Apotheke AG (SAP) companies registered under Swiss Law and Sciensus Pharma Services Limited (SPSL) a company registered in the United Kingdom intend to use the information you have provided to us as part of your service. Together these entities make up the Sciensus Group of companies.

SPSL will only process limited identifiable patient information as part of their role, as they manage data protection compliance for SHC & SAP. This will be access controlled for the UK Information Governance Team who will support on all data protection matters, including individual rights requests.

The United Kingdom and Switzerland are recognised as providing an adequate level of data protection under applicable data protection laws, and personal data may therefore be transferred to these jurisdictions on the basis of their adequacy decisions

This notice is regularly reviewed, and changes made from time to time. Any changes we make will be posted on this page.

SHC & SAP do not make significant decisions based solely on automated processing unless that decision is required or authorised by law.

If you have any questions relating to this notice, please contact our UK based Data Protection officer on:

Mobile Telephone Number: +447921877186

Email Address: DPO@sciensus.com

UK Postal Address: 107, Station Street, Burton Upon Trent, DE14 1SZ.

If you would like to download a copy of this privacy notice, please click here [\(link\)](#)

Where we get your information from

Your personal information is collected from the following sources:

From You – Information you provided when you complete our forms, contact us, when we visit you as part of our nursing services or a patient support programme, during our delivery process of your medicine or online etc.

Healthcare Professionals – Hospitals, physicians or consultants who are involved in your care.

Health Insurers – Information we receive from your health insurer in relation to your treatment.

Legal – Solicitors, legal professionals acting on your behalf.

Regulators – Where you have approached them independently to act on your behalf.

Other People – “recipient” you have authorised to act on your behalf or receive medicine when we carry out our deliveries. We will also hold their minimal personal information on your patient record.

Parent, Guardian or Responsible Person – Assigned and recorded to act on behalf of a paediatric patient (infant, children and adolescents) or someone who lacks capacity.

For what purpose do we collect your personal information?

You provided your consent to your healthcare professional to refer you onto our service for us to either dispense your medication and/or provide nursing services for you (e.g. when our nurses perform intravenous infusions in your home). We use the information we receive about you to create and maintain a patient electronic record.

What Information do we collect from you?

Please see what personal & sensitive personal information we collect on you, including the lawful grounds for us to process your information:

Personal data

- Name, address, email, telephone number
- Date of Birth & Gender
- Authorised recipients/Next of Kin or Carers contact details, if applicable
- Social Security Number
- Information about Health Insurance
- Treating physician contact details
- Patients signature
- Health Insurance contact information

Sensitive personal data

- Prescription/drug/dosage and medication information
- Medical/Health conditions
- Known allergies
- Information about your mental and physical wellbeing
- Accessibility markers (Hearing impairment, Visual impairment, Mobility impairment)

Other non-identifiable data

Pseudonymised (personal information which has been replaced and can only be identified using a key) & Anonymised data (Non identifiable information).

What is our lawful ground for processing personal data?

Under the Federal Act on Data Protection (FADP) we are required to state the grounds for processing your personal data. The following grounds apply:

- **Consent:** The individual (you) has given clear consent for (SHC & SAP) to process their personal data for a specific purpose.
- **Explicit Consent:** The individual (you) has given explicit consent for (SHC & SAP) to process their personal data for a specific purpose.
- **Contractual Necessity:** Processing is necessary for the conclusion or performance of a contract.
- **Legitimate Interest:** Non personal identifiable data to help (SHC, SAP and SPSL) fulfil its operational and contract requirements.

Why do we collect this Information?

Details you provide during your service with us will primarily be used in the following ways:

- To create and maintain a record of your care and treatment and to communicate with your healthcare professional or Health Insurance Provider.
- Create and manage your prescription records and provide pharmacy services to you.
- Contact you to arrange your delivery or patient support/nursing programme.
- Allow us to dispense and deliver the correct medication to you.
- Answer any questions or concerns you may have and provide customer support.
- Ensure we charge the health insurer or other bill payers the correct amount for our services delivered to you.
- Provide regular reminders to you in accordance with your service, e.g. for deliveries, nurse visits.
- Provide advice to help you to get the best from your treatment and understand your level of engagement with your treatment through statistical and monitoring information.
- To capture adverse events which you may report to us.
- To enable the storage, archive and disposal of paper & electronic documentation in line with regulatory guidance.
- To record and manage (where appropriate) any adverse events or side effects relating to your medication that you tell us about. We will only share pseudonymised adverse event if the patient participates in a support programme with the pharmaceutical company and basic patient details alongside the adverse event with your healthcare professional.

We may also use your information for service improvement/health and safety purposes such as:

- To train our staff in providing services to you.
- Contact you to help us improve the quality of our services based on the feedback we have collected from your reviews and comments. We may also contact you to support us on marketing activities.
- To conduct patient engagement surveys and see how well we are doing.

How long we keep your information

We will store your information for 20 years after your service has ceased with us.

Who will we share your information with?

We want to maintain your trust and protect your personal information, and when we share your personal information, we are doing so because it is essential to your service.

In “Where we get your information from” section we have detailed the sources from which we may receive personal information about you, but we also share your personal information with the same sources, including partners and suppliers which work on behalf of us.

We may share your personal data with the following:

Companies in the Sciensus Group – Sciensus AG (SHC), Sciensus Apotheke AG (SAP) companies registered under Swiss Law and Sciensus Pharma Services Limited (SPSL) a company registered in the United Kingdom.

Healthcare Professionals/physician – On whose behalf we deliver services.

Health Insurers – To ensure your treatment is funded.

Legal – Solicitors, Legal Representatives acting on your behalf.

Law Enforcement Agencies – For the purposes of prevention and detection of crime or fraud.

Auditors – External or internal as part of our performance reporting or compliance with legal / regulatory obligations.

Pharmaceutical Companies/medicine manufacturers – In a pseudonymised format which does not identify a specific patient.

How we keep your information safe

Sciensus Group of companies (SHC, SAP and SPSL) are committed to protecting the security of Personal Information by endeavouring to ensure appropriate technologies and processes are maintained to avoid unauthorised access or disclosure. We use multi-factor authentication to ensure that only authorized users can access our systems. This means that users need to verify their identity through multiple methods, such as a password and a code sent to their phone. We also have strict access controls in place to limit who can see and use your data. In the event of a data breach, we have processes in place to ensure we notify affected persons promptly to ensure transparency and take necessary actions to protect your data.

Switzerland and the UK are considered to have adequate levels of data protection by the regulators in both Switzerland and the UK.

All Personal Information collected by SHC, SAP and SPSL is controlled to the highest possible degree when it is being transmitted. Intercompany data transfer agreements are in place to enable data transfer between the Sciensus Group of Companies.

Your Rights

You have a number of rights regarding how Sciensus use your data including the Right to: Access, rectify, erase, restrict, transport, and object to the processing of your personal information. SPSL manage these requests from a central point, based in the UK, but liaise closely with Sciensus colleagues based in Switzerland. We will review and respond to requests to exercise rights under the FADP within 30 days.

If you wish to exercise any of your rights at any time, or have a complaint or just a question about your data please contact the UK Information Governance Team on the following:

Information Governance & Security Team

Telephone number: +447921877186

Email Address: DPO@sciensus.com

Your right of access

You have the right to ask us for copies of your personal information we hold on you, whether in paper or electronic form. Each request will be dealt with on an individual basis.

Your right to rectification

You have the right to ask us to rectify 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.

Your right to restriction of processing

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

Your right to object to processing

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

Your right to data portability

You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances where it is technically feasible. This is not an absolute right and may not be possible on all occasions.

Your right to information

You can request details about data processing including the purpose, the retention period, data origin, and recipients.

Consent

You have the right to withdraw consent depending on the nature of processing which is being conducted.

Your right to complain

You have the right to make a complaint if you have any concerns about how we collect, use or store your personal data, or if you believe your data protection rights have been violated.

We encourage you to contact us directly in the first instance so that we can try to resolve the issue promptly.

If you wish to make a complaint, you can do this via multiple routes using the contact details above.

We aim to ensure you receive a full response within 20 working days.

If you are not satisfied with the response you have received, you have the right to lodge a complaint with the relevant data protection regulator within Switzerland.

You can contact the Data Protection Officer or the Federal Data Protection and Information Commissioner (FDPIC) at: <https://www.edoeb.admin.ch/en/contact-2>