

# Privacy Policy for UKHSA's IMBA Internal Dosimetry Software

October 2021

## INTRODUCTION

1. Welcome to UK Health Security Agency's ("UKHSA") privacy policy. UKHSA is an executive agency of the Department of Health and Social Care (DHSC) with operational autonomy. UKHSA provides the government, local government, the NHS, Parliament, industry and the public with evidence-based professional, scientific expertise and support.
2. UKHSA respects your privacy and is committed to protecting your personal data. This privacy policy should be read in conjunction with our generic privacy policy which can be found at <https://www.UKHSA-protectionservices.org.uk/tc/privacy-policy>. The generic privacy policy provides information on individual's rights regarding their data.
3. This privacy policy specifically sets out the type of personal data that we collect when you acquire a licence to use UKHSA's IMBA Internal Dosimetry Software and what we do with your personal data.

## CONTROLLER

4. UKHSA ("we", "us" or "our" in this privacy policy) is an executive agency of the DHSC. The DHSC is the data controller for the personal data processed by UKHSA in fulfilment of its remit. We are listed under the [Department's registration](#) with the Information Commissioner's Office (ICO).
5. The DHSC has appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (as defined in the glossary below), please contact the DPO using the details set out below.

## CONTACT DETAILS

6. If you have any questions about this privacy policy or our privacy practices, please contact our DPO by emailing or writing:

Email address: [data\\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk)

Postal address:

Data Protection Officer  
Information Risk Management & Assurance Directorate  
1st Floor North, 39 Victoria Street  
London, SW1H 0EU

7. You also have the right to contact the Information Commissioner's Office if you have any concerns about how we use and protect your personal data. You can do so by calling the ICO's helpline on 0303 123 1113, visiting [www.ico.org.uk](http://www.ico.org.uk) or writing to the ICO at:

Customer Contact  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow, SK9 5AF

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

8. We keep our privacy policy under regular review. This version was last updated in October 2021. Historic versions can be obtained by contacting us.
9. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THE DATA WE COLLECT ABOUT YOU

10. Personal data, or personal information, means any information about an individual from which that person can be identified directly or indirectly. It does not include data where the identity has been removed (anonymous data).
11. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
  - **Identity Data** includes your name, billing address, email address and telephone numbers.
  - **Financial Data** includes payment and/or card details and payments that you have made.
  - **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, other technology on the devices you use to access this website and information about how you use our website.
  - **Enquiries Data** which includes enquiries made by you by telephone, email, post and through our website and our responses to your enquiries.
12. We also collect, use and share Aggregated Data such as statistical or demographic data. Aggregated Data could be derived from your personal data but is not considered personal data as it cannot be used directly or indirectly to reveal your identity. For example, we may aggregate your Technical Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.
13. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

14. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## HOW IS YOUR PERSONAL DATA COLLECTED?

15. We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you apply for our products or services, create an account on our website; subscribe to our service or publications; request marketing to be sent to you; or give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy <https://www.UKHSA-protectionservices.org.uk/tc/cookies> for further details.

**HOW WE USE YOUR PERSONAL DATA**

16. We use your personal data to provide software licensing, software installation and updates files, technical documentation and support services to you under contract This information is kept and destroyed in accordance with the UKHSA data retention schedule.
17. We will only use your personal data when the law allows us to. Most commonly, we rely on your consent as a legal basis for processing your personal data. You have the right to withdraw consent to at any time by contacting us. In addition, we also rely on the legal bases set out in the table below. Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new customer, process and deliver your order, manage our relationship with you, to administer and protect our business including this website, to use data analytics to improve our website, products/services, customer relationships.	(a) Performance of a contract with you.  (b) Necessary for our legitimate interests (to recover debts due to us).

**CHANGE OF PURPOSE**

18. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
19. 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 and/or obtain your consent.
20. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**DISCLOSURES OF YOUR PERSONAL DATA**

21. We do not share your personal data with any third parties unless we have your specific consent to do so.

22. We do not transfer your personal data outside the European Economic Area (EEA).

#### **DATA RETENTION**

23. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. Please contact us if you wish to discuss this further or wish to see a copy of our retention policy.

#### **YOUR RIGHTS OVER YOUR PERSONAL DATA**

24. Under data protection law, you have a number of rights over your personal data. You have the right to:

- ask for a copy of any information we hold about you
- ask for any information we hold about you that you think is inaccurate to be changed
- ask us to restrict our use of your information, for example, where you think the information we are using is inaccurate
- object to us using any information we hold about you, although this is not an absolute right and we may need to continue to use your information – we will tell you why if this is the case
- delete any information we hold about you, although this is not an absolute right and we may need to continue to use your information – we will tell you why if this is the case
- ask us not to use your information to make automated decisions about you without the involvement of one of our staff

25. You can exercise any of these rights by contacting us using the details provided earlier in this notice.

#### **ABOUT THIS PRIVACY NOTICE**

26. The personal information we collect and use may change so we may need to revise this notice. If we do, the version number and date provided below will be updated.

Version 2.0

Date: 29 October 2021