

The Family Practice and Alphamedica Data Processing and Handling Procedures Policy

Version 1.0 May 2018

Aim

The aim of this policy document is to inform clients of The Family Practice and Alphamedica on the data processing and handling procedures of the organisation, and to declare that such procedures are compliant with current general data protection regulations issued by the European Commission and ratified in Maltese law.

Objectives

The Family Practice and Alphamedica bind themselves to abide by the following general principles of data processing and protection:

1. Obtain and process information (data) fairly;
2. Keep personal data only for one or more specified, explicit and lawful purposes;
3. Process personal data only in ways compatible with the purposes for which it was given initially;
4. Keep personal data safe and secure;
5. Keep personal data accurate, complete and up-to-date;
6. Ensure that personal data is adequate, relevant and not excessive;
7. Retain personal data no longer than is necessary for the specified purpose or purposes;
8. Provide a copy of personal data to that individual, on request.

Details

1. The Family Practice and Alphamedica obtain, retain and process personal data mainly through the following processes:
 - a. A direct personal request for an appointment with a professional providing services at The Family Practice clinic
 - b. A direct personal request, or referral from a professional, to have a medical procedure performed at The Family Practice clinic
 - c. A personal request by a client to utilise the services of a family doctor at The Family Practice clinic
 - d. A request by a company to register its employees with The Family Practice and Alphamedica
 - e. A request by a company to Alphamedica to provide various company doctor services to the company and its employees
 - f. A request by a company to Alphamedica to provide medical information relevant to an employees' employability, sickness, fitness to work, or impacts from work activities
 - g. Other similar requests for related activities and services provided by The Family Practice and Alphamedica
2. The Family Practice and Alphamedica have requested and shall continue to request personal data for the purposes of furthering lawful aims and objectives, namely providing primary medical care in a community based medical and dental clinic, and providing occupational health services to small,

medium and large companies in Malta and Gozo. The Family Practice and Alphamedica participates in national and international medical research projects within the European Union, including (but not exclusively) for the European Commission and for NGOs such as Cancer Research UK. Research is performed exclusively on anonymised data, with all personal identifiers removed

3. The Family Practice and Alphamedica binds itself to process such personal data only in ways compatible with the purposes in “2” above. It will not disclose personal data to third parties with the exception of anonymised data for medical research and other purposes legally allowed by data protection legislation
4. Such data is held on computers and servers at The Family Practice and Alphamedica address, which are isolated from internet access via a firewall system, which are protected from unauthorised access by being physically secured in offices with adequate security measures (including an intruder alarm system), and from virtual access via password controls. Copies of the data are securely kept off-site by The Family Practice and Alphamedica administrators and staff as insurance (backup) against a computer failure. Paper records are kept under lock and key at The Family Practice and Alphamedica office
5. The Family Practice and Alphamedica communicates with clients regularly, and clients are encouraged to inform us of any changes in personal details
6. The Family Practice and Alphamedica shall normally only retain personal data such as the name, address, I.D. card number, email address, telephone number, medical information (including test results and images), and the necessary service utilisation and payment details necessary for service provision. In the cases where more detailed and specific information is requested (such as for a specific medical intervention, a specific medical report or a specific research project), this shall be done in an open and transparent way, and shall be requested and used for a specific purpose and only on opt-in consent
7. The Family Practice and Alphamedica shall immediately delete any personal data on request, provided that this information shall not be necessary for compliance with legislation (including the keeping and reporting of financial activities), managing of financial accounts, quality assurance or auditing purposes, or other records essential for the proper and legal functions of The Family Practice and Alphamedica. Medical information is sensitive information which is the shared property of the patient concerned, and the professional providing medical care. Medical information has inestimable long-term value, and the consequences of its destruction are often impossible to predict. As such, The Family Practice and Alphamedica shall retain any medical information indefinitely in all but exceptional cases
8. The Family Practice and Alphamedica shall provide copies of all personal data on file at request

Further information

For further information please contact The Family Practice and Alphamedica Data Controller Dr. Jean Karl Soler on +356 99494324 or info@thefamilypractice.com.mt or at The Family Practice and Alphamedica, 19, Triq ir-Rand, Attard ATD1300, or our Data Protection Officer Ing. Karl Camilleri on karl@camilleri.eu.com