
DATA PRIVACY POLICY

Being transparent and providing accessible information to our service users about how we use your personal information is a key element of the General Data Protection Regulations (GDPR).

This policy document reflects on how we collect and process your personal data. We use information within our organisation for:

- The management of patient records and provision of clinical care and assessment
- Communication with other clinicians concerning any conditions or examination findings you may have
- Communication with a regulatory authority or government agency directly related to the provision of medical certification that you have engaged our services for
- Communication with you in managing your individual case, or through reminders for appointments or when certificates are about to expire
- Ensuring ongoing quality of care and compliance with regulation through retrospective audit
- The management of our services to ensure that appropriate and high quality resources are in place both now and in the future
- Compliance with any legal or government regulations that may apply to us

About us

Magenta Medical is a privately owned medical services company, registered in the United Kingdom. The nominated data controller is Dr Iain MacGarrow.

What information do we collect and use?

We collect the following types of information from you directly or about you from a third party engaged in the delivery of your care:

- **Personal data** meaning any information relating to an identifiable person who can be directly or indirectly identified from the data. This includes, but is not limited to name, date of birth, address, contact details, medical records number or regulatory authority identification number (e.g. CAA reference number).

- **Special category or sensitive data** such as medical history including details of appointments and contact with you, medication, correspondence and clinical notes, treatments, results of investigations, ethnic origin, family history and sexual orientation.

Who will we share your information with and how do we store it?

In order to provide the medical service that you have asked us to provide we may share your information with the following organisations:

- Regulatory bodies specific to the medical service requested e.g. the UK Civil Aviation Authority (CAA) for a UK pilot medical
- Medical specialists if applicable to process your medical e.g. a cardiology consultant specialist for ECG over reading
- Laboratory or test providers if such tests are required or requested as part of your medical assessment
- Police or governmental bodies if required to do so by law

Your information will be stored on our medical records system electronically. We currently use Semble as a platform for this; within this service your data is held in UK based data centres in compliance with the provisions of ISO27001 and will be encrypted both at rest and in transit. Further information on the specifics of this is available at [Semble Security Overview July 23.pdf](#)

If further laboratory testing is undertaken we will need to share some of your data with our laboratory provider – this is currently Radox Health which is headquartered in Northern Ireland.

We are required to use medical records systems of regulators in addition. For example, for a UK medical we will enter your medical information onto Cellma, provided by RioMed Ltd. The data controller for this service is the UK CAA. Data stored in these systems may be located in data centres outside of the UK or EU. The data controller for these records is the CAA.

Additionally we may need to share payment information with our payment processors to facilitate electronic funds transfers for your purchase of medical services. No medical or sensitive information will be shared with any payment processors or financial institutions.

We will **NOT** share your data for marketing or data analytics purposes with any outside organisation.

Data retention – how long will we keep your information for?

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying and medical, legal or regulatory requirements. The duration of this may be different depending upon what data we hold and for what purpose it was collected for. However, as a general guide the CAA Medical Department Records Retention Schedule states that private pilot medical records will be kept for 10 years following the expiry of the last medical certificate issued. For class 1 and 3 medicals, or for any pilot who has flown commercially, medical records are kept for 70 years (though the data may be anonymised during that period).

If at any point we cease performing medical assessments on behalf of a regulatory body, we will return the data to the regulatory body and cease holding it ourselves.

Right of access, rectification and erasure

The GDPR allows you to find out what information is held about you including information held within your medical records. This is known as “right of access”.

If you would like to have access to your records please let us know and we will facilitate this. You can contact us on hello@magentamedical.co.uk

Additionally you have the right to:

- **Request rectification:** if you notice anything on your records which you consider to be incorrect, please get in touch and we can discuss how we might rectify this accordingly.
- **Request erasure:** requesting complete deletion of the personal information that we hold about you if there is no reason for us to continue to process it.
- **Object to processing:** if there is a particular use that you do not want us to use your data for then please let us know and we can discuss facilitating this.
- **Request transfer:** you may wish to request the transfer of your data to another provider. This only applies to the data we hold for you – records held on the CAA Cellma system are the responsibility of the CAA.

As part of our data security procedures, we may need to confirm your identity as part of complying with the above access or alteration measures. There is not normally a fee payable for accessing or amending your data unless the request is deemed excessive – in this case a reasonable fee may be charged.

Complaints

For general or clinical complaints, please see our complaints policy document. We would welcome the opportunity to resolve your complaint initially (please contact us at hello@magentamedical.co.uk), but if you prefer or are unsatisfied with our response you can also complain to the Information Commissioner’s Office. To see more information or to make a complaint to the Information Commissioner, please visit <https://ico.org.uk/make-a-complaint/>