



KernowCann

Medical Cannabis in Cornwall

KernowCann Privacy Policy

Last Updated: September 2023

KernowCann is a patient advisory and referral service related to medical cannabis. This privacy policy sets out how KernowCann may collect or process your personal data in connection with the KernowCann website and/or services.

Collection of Information

The personal information that KernowCann may collect from you may be given by you voluntarily, collected automatically or obtained from a third party source.

Information that you give voluntarily may include contact information, details of current and past medical history and contact details for other clinicians responsible for your care. Any information that KernowCann requests will be made clear, along with the reason for requiring that information.

Information that KernowCann may collect automatically may include your IP address, browser type, timezone or other information related to your technical interactions with the KernowCann website and online services. This information helps KernowCann to understand the nature and requirements of service users, allowing services to be improved or adapted. Some of this information may be collected using cookies or similar technology.

Information that KernowCann may collect from third party sources may include medical information from your GP or other related clinician.

The types of data collected from Patients and why

- **Patient Data** – contact information, date of birth, gender. This information is collected so that KernowCann is able to contact you to arrange a consultation or review.
- **Medical Information** – past medical history, current conditions or ongoing investigations. This information is collected so that KernowCann can ascertain whether a referral for medical cannabis treatment is safe and appropriate.
- **Prescription data** – details of current or past medicines that you have been prescribed, any allergies you may have to medicines and how these affected you. This information is collected so that KernowCann can ascertain whether medical cannabis would be a safe and appropriate treatment for you.
- **Adverse or special situations** – this may include any adverse medical events, safeguarding concerns or extra needs. This information is collected to ensure that any medical cannabis service is safe and that any unexpected events can be considered and planned for.

- **Survey information** – occasionally KernowCann may ask you to complete a survey related to medical cannabis and health. This information helps plan, adapt and improve services.
- **Guardian/Carer information** – contact details of guardians or carers of patients may be collected to ensure that all members of a patient’s care team are informed and safe care is delivered.

The types of data collected from Healthcare Professional/providers and why

- **Contact Information** – Names, addresses and contact details. This information is collected to enable to sharing of information to deliver education or discuss the care of patients.
- **Professional Informaiton** – job role, registration information, qualifications or clinic details. This information is collected to enable correct and timely communication about education and services or multidisciplinary discussions to enable appropriate patient care.
- **Practice Informaiton** – size of practice, prevalence of presentations including chronic pain, rates of prescribing of drug types. This information is collected to discuss medical cannabis services within healthcare settings and to deliver education and information suited to each practice setting.

The types of data collected from website users

- **Contact Information** – name, address, contact numbers, email – in order to contact users if they request information.
- **Technical Information** – IP address, server information, interaction and footfall on website, time zone. This is collected to help improve the quality of online services.
- **Any other data voluntarily given** – Website users may give voluntary information or descriptions when completing online communications with KernowCann.

Lawful processing of personal information

Your personal or sensitive personal information is processed legally under the following criteria:

- **Consent** – You have given your consent to the processing of the data.
- **Performance of a contract** – When it is necessary to process this information in order to fulfill a contract with you or when it is necessary to process this information prior to entering into a contract with you.
- **Legal Obligation** – Where we must process your information to be compliant with legal obligations.
- **Legitimate Interests** – Where processing is necessary for a legitimate interest and does not override your own rights and freedoms.
- **Health and social care** – Where processing is necessary for the provision of healthcare treatment.

Online Tracking

As stated above. Data may be collected that relates to your online interaction with KernowCann services. This includes browsing behaviour. This may be collected through cookies, web beacons and other tracking technology. Data may also be collected by through third party collecting tools such as Google analytics or Wix analytics. These tools analyse data sent to your browser or mobile device including the pages you visit.

Most internet browsers automatically accept cookies but you may be able to change the settings on your own browser to stop accepting cookies or to prompt you before accepting them. More information can be found at www.allaboutcookies.org

Data Sharing

KernowCann may share your data with the following categories:

- **Your Referrer** – If you were referred to KernowCann by a healthcare professional we may share related information with them.
- **Anyone with whom you have consented for us to share your information** – You will be asked and notified if we need to share your information with someone else.
- **MyAccess Clinics** – The data of patients who wish to be referred or discussed for medical cannabis treatment will be shared with MyAccess clinics who provide the clinical services and prescriptions. This is to enable safe and consistent care.
- **Third party providers** – Occasionally data will need to be shared with a third party provider such as MyAccess Clinics as explained above. This is to enable delivery of care or escalation of care if needed.
- **A competent law enforcement body, regulatory, government agency, court or other third party** – if KernowCann deem it necessary as a matter of law, safety or professional obligation to share data with these bodies. This may be in the protection of a patient, in the legal rights of a clinician or KernowCann or for the safety of individuals or groups.

Any third party will undergo checks to ensure that their own data collection safety is guaranteed. There will be written contracts with them to ensure data shared is compliant with data protection requirements.

Third Party sites

The KernowCann website may contain links to other websites operated by third parties or social media features. These third party sites may collect their own data about you. Your interactions with those third party sites are governed by their own data and privacy policies and KernowCann does not control and is not responsible for the data they may collect.

Data Security and Retention

It is important that any data collected from you is kept confidential and safe. Your data will be collected and stored using commercially accepted physical, technological and administrative methods. These methods will also be used to store your data and keep it safe from accidental or unlawful destruction, loss, disclosure or access. The measures used are designed to provide a level of security appropriate to the risk of processing your personal data.

In the event that any data in the control of KernowCann is compromised, responsible steps will be taken to investigate, notify individuals whose data has been compromised and take other steps in accordance with data protection regulations and the Caldicott Principles.

Your data will be collected and kept for as long as is required to fulfill a contract with you or provide you a service or as long as is required for legal processes, to resolve disputes and enforce our agreements. When there is no ongoing legitimate clinical or professional interactions with you that requires your data to be processed or stored it will either be deleted, anonymized or stored safely until deletion is possible.

Your data will be stored within the UK and not transferred to any third party outside of the UK that does not meet criteria for the appropriate level of data protection.

Your Rights

You have the following data protection rights:

- If you wish to access your personal data, you can do so at any time by contacting KernowCann.
- If you wish to correct or update your personal data you can do this by contacting KernowCann.
- You can request deletion of your personal data stored by us by contacting KernowCann.
- You can object to or ask us to restrict the processing of your personal data or request portability of your personal data by contacting KernowCann.
- You can opt out of marketing communications.
- If we have already collected your personal data you can withdraw your consent at any time by contacting KernowCann.
- You have the right to complain to the data protection authority at www.ico.org.uk/make-a-complaint

Our response to your requests concerning your personal data will be in line with our legal and professional responsibilities.

KernowCann reserves the right to make changes to this privacy policy in response to changing legal and professional guidance. The date at which this policy was last updated is displayed at the beginning of the policy and can be found on our website.