



Capture Stroke Ltd
Privacy Policy (Web Application)



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Version Control

Revision number	Date	Author	Revision description
1	15/08/2023	Stephen Middleton	First iteration approved



Privacy

Please see [this page](#) for our <https://CaptureStroke.com> website Privacy Policy. This document outlines our Capture Stroke web application Privacy Policy (each of and together the "Sites" or "Service") are owned and operated by Capture Stroke Ltd of Clavering House, Clavering Place, Newcastle Upon Tyne, Tyne & Wear, United Kingdom, NE1 3NG ("we", "us", "our").

We are committed to protecting and respecting your privacy and this Privacy Policy (together with our Website [Terms and Conditions](#) and any other documents referred to therein) sets out how we process the personal data of each customer to the Service, where such personal data is provided to us through any of the Services. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By ticking the box/toggle where indicated on the Sites, submitting your personal data to us, and using our services you agree to the terms and practices described in this Privacy Policy. For the purposes of data protection law: the data processor is Capture Stroke Ltd and data controller is the Hospital or Trust using the web application service. To learn more about data processors and data controllers, please see the [ICO definition of what are processors and controllers](#).

We may amend this Privacy Policy at any time. Any changes we may make will be posted on this page, so please check back frequently. Your continued use of the Sites and our services after posting will constitute your acceptance of, and agreement to, any changes. You will be notified by email and/or in-app notification.

You can set, accept and reject your cookies on the web site. The cookies on the web application cannot be disabled as they are Session Cookies, used for login purposes only.

If you have any questions about this Privacy Policy, please contact support@capturestroke.com We will respond in 3 working days.
Last updated: 15th August 2023.

1. WHAT IS PERSONALLY IDENTIFIABLE INFORMATION (PII) / PERSONAL DATA?

1.1. Personal data or PII means any information relating to a person who can be identified either directly or indirectly by that information; For the user, e.g. member of staff using the application, this data it may include:

- Name
- Profession
- Band
- email address
- phone number
- IP address



For the patient data being recorded this may include:

- Title
- Forename
- Surname
- Date of Birth
- Date of Death
- Sex
- Ethnic origin
- NHS Number
- Hospital Number
- Address Line 1
- Address Line 2
- Town/City
- County
- Postcode

There is also physical data about the patient and their journey on the stroke pathway that is also collected as per the SSNAP audit requirements.

With regards to the patient data, there are questions in the web application regarding 'Consent for your patient identifiable information to be included in SSNAP' if the most recently asked consent question is answered 'No, Patient Refused Consent' then the identifiable information is removed from the SSNAP Upload csv file as per the patient's wishes.

2. INFORMATION WE MAY COLLECT FROM YOU

2.1. We may collect and process the following data about you:

- Information you provide to us – This includes:
 - Information provided at the time of registering to use our service, for the We may also ask you for information when you report a problem with our services provided by us.
 - If you contact us, we may keep a record of that correspondence and/or any video or audio uploads or telephone calls.
 - We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Information we collect about you – When you visit the Sites we may automatically collect information about your computer or device, including your IP address, information about your visit, and how you use the web application. This information may be combined with other information you provide to us, as described above to populate the audit.



2.2. Data security is extremely important to us. All data is stored encrypted-at-rest (i.e. in storage) and also during transit. Your data is stored in the United Kingdom either at the Trust or at our datacentre partner (Redcentric) within the HSCN.

2.3. Only data exported by the end user, with the patient's consent to share, is sharable outside of the platform to the SSNAP web tool by CSV file.

3. NOTIFICATIONS (EMAIL, IN-APP NOTIFICATIONS)

3.1. You may choose to opt-in and out to receive our email and in-app communications.

3.2. In order to unsubscribe from emails, please select "Unsubscribe" from an email or toggle in-app. Similarly, toggle notifications from Administration > Notification Subscriptions. Please contact us at support@capturestroke.com if you require any assistance with unsubscribing from our newsletter.

4. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

4.1. The platform has been developed to ensure that data minimisation principles are met. What this means is, that we build solutions that use as little data as required to provide a clinically safe and enjoyable user experience. We will only process your Personal Data, in accordance with applicable law, for the following purposes:

- creating and maintaining your customer account.
- resolving any disputes, if you lawfully exercise your rights or if you wish to dispute any part of our service offering;
- ensuring the security of your account and our business, preventing or detecting fraud or abuses of our Sites, for example, by requesting verification information in order to reset your account password (if applicable);
- to administer the Sites and for internal business administration and operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to comply with the audit requirements of any NHS software;
- as part of our efforts to keep the Sites safe and secure; and
- to comply with applicable law, for example, in response to a request from a court or regulatory body, where such request is made in accordance with the law.

4.2. Your consent, as the "Data Subject", to the processing as specified in this Policy is the primary legal ground for our processing of your Personal Data. However, there may be circumstances where we may also rely on other valid legal grounds for the processing of your Personal Data, such as:

- your request for content, products or services necessitating steps including processing of your Personal Data to be taken prior to entering into contract with you and any processing that is necessary for the performance of such contract;
- compliance with any legal obligation to which we are subject, such as, for example, the processing for the purposes of complying with applicable law.

4.3. Should the purpose of data collection change, you will be informed and opt-in consent re-obtained.



4.4. No user data is intended to be shared or processed for any purpose that has not been made clear to the user. The platform has been developed to ensure that data minimisation principles are met. What this means is, that we build solutions that use as little data as required to provide a clinically safe and enjoyable user experience. Capture Stroke Ltd has followed data minimisation principles by ensuring that data collected and processed is not be held or further used unless:

- this is essential for reasons that were clearly stated in advance to support data privacy; and
- explicit opt-in re-consent is obtained

4.5. To opt out of each, or any, of the processing activities, please contact us at support@capturestroke.com. If you opt out of us *holding and maintaining your account* or us *complying with applicable law* you will not be able to use the Service because these processing activities are required to deliver you the Service.

5. DISCLOSURE OF YOUR INFORMATION

5.1. There are circumstances where we wish to disclose or are compelled to disclose your Personal Data to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure to:

- our subsidiaries, branches or associated offices;
- your NHS Clinical Commissioning Group, if they have referred you to Capture Stroke. Any information shared with your NHS Clinical Commissioning Group will be in anonymised aggregated form and will not identify you. You will always be asked to opt-in to sharing any identifiable data;
- to comply with our legal obligations to carry out the instructions of the controller, for example, if you are referred to the Service by your NHS GP, we may adopt the legal basis of the controller to allow us to carry out their instructions, and may, for instance, share data with the NHS Clinical Commissioning Group (CCG) or care organisations that provided you access to the Service. This will be in anonymised format. You will always be asked to opt-in to sharing any identifiable data, with any new party or for any new purpose;
- the commissioning NHS CCG, Trust, ICS or local authority of Capture Stroke;
- to facilitate the provision of goods and/or services to you, together with such other goods and/or services as we and/or they feel may interest you;
- to research organisations where the information has been anonymised and aggregated;
- another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your Personal Data will be permanently transferred to a successor company;
- public authorities where we are required by law to do so; and
- if required, in order to receive legal advice;

6. RETENTION OF PERSONAL DATA



6.1. Your Personal Data will be retained until your last use of our services and normally for a period of three years thereafter, unless longer retention is required by applicable local law or where we have a legitimate and lawful purpose to do so. However, we will not retain beyond this period any of your Personal Data that is no longer required for the purposes set out in this Policy. The retention of your Personal Data will be subject to periodic review.

6.2. Please contact us at support@capturestroke.com if you would further details about our data retention periods.

6.3. If you no longer wish for Capture Stroke to process your personal information, you are free to withdraw your consent by disabling your account. To do so, please contact your local Capture Champion at the trust, and as an administrator they will be able to disable your account. Please note that after you disable your account, you will not be able to log in and enter data into Capture Stroke, however your audit information will still be available to the administrators of Capture Stroke including the Capture Champions at the trust. If you have any questions or concerns about disabling your account or withdrawing your consent, please reach out to our Support Team for assistance.

7. DATA SUBJECT RIGHTS

7.1. Data protection law provides Data Subjects with numerous rights, including the right to: access, rectify, erase, restrict, transport, and object to the processing of, their Personal Data. Data Subjects also have the right to lodge a complaint with the relevant data protection authority if they believe that their Personal Data is not being processed in accordance with applicable data protection law. To execute any of your rights listed, please contact us by writing at support@capturestroke.com. We will get back to you in 3 working days, and respond to any requests to exercise your rights within 21 working days.

- Right to make subject access request/access your Personal Data (SAR) (Article 15 GDPR): Data Subjects may, where permitted by applicable law, request copies of their Personal Data. If you would like to make a SAR, i.e. a request for copies of the Personal Data we hold about you, you may do so by writing to support@capturestroke.com. The request should make clear that a SAR is being made. You may also be required to submit a proof of your identity.
- Right to rectification (Article 16 GDPR): You may request that we rectify any inaccurate and/or complete any incomplete Personal Data.
- Right to withdraw consent (Article 7 GDPR): You may, as permitted by applicable law, withdraw your consent to the processing of your Personal Data at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit certain service features for which the processing of your Personal Data is essential.
- Right to object to processing including automated processing and profiling (Article 21 GDPR): You may, as permitted by applicable law, request that we stop processing your Personal Data. In relation to automated processing and profiling, you may object to the processing and you will have the right to obtain human intervention.
- Right to erasure (Article 17 GDPR): You may request that we erase your Personal Data and we will comply, unless there is a lawful reason for not doing so. For example, there may be an overriding legitimate ground for keeping your Personal Data, such



as, a legal obligation that we have to comply with, or if retention is necessary for us to comply with our legal obligations.

- Right to data portability (Article 20 GDPR): In certain circumstances, you may request that we provide your Personal Data to you in a structured, commonly used and machine readable format and have it transferred to another provider of the same or similar services. We will comply with such transfer as far as it is technically feasible. Please note that a transfer to another provider does not imply erasure of your Personal Data which may still be required for legitimate and lawful purposes.
- Your right to lodge a complaint with the supervisory authority. We suggest that you contact us about any questions or if you have a complaint in relation to how we process your Personal Data. However, you do have the right to contact the relevant supervisory authority directly. To contact the Information Commissioner's Office in the United Kingdom, please visit the [ICO website](#) for instructions.

7.2. We do not knowingly collect Personal Data online from individuals under 18. If you become aware that a child has provided us with Personal Data without parental consent, please contact us at support@capturestroke.com. If we become aware that an individual under 18 has provided us with Personal Data without parental consent, we will take steps to remove the data and cancel that individual's account.

7.3. Capture Stroke Ltd retains your Personal Data:

- for as long as you maintain an account or as needed to provide you the Services and/or
- as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

7.4. Personal Data is destroyed when it is no longer necessary for the purposes listed in 9.3. The specific destruction process and method are as follows:

- Personal Data printed on the paper is shredded, burned, pulped, pulverized, or incinerated; and
- Personal Data stored in electronic form is deleted using technology designed to prevent the recovery of the Personal Data.

8. COMPLIANCE

8.1. Capture Stroke Ltd comply with recognised International Data Management Standards, including ISO9001 and ISO27001 and have been accredited as part of this process.

8.2. Capture Stroke Ltd are fully compliant with The Data Protection Act 1998 and General Data Protection Regulation (GDPR).

8.3. Sites are developed alongside recognised compliance standards such as NHS Data Standards, including the NHS Information Governance toolkit.

8.4. The Capture Stroke web application has been PEN tested including coverage of the OWASP Top 10.

9. DATA PROTECTION OFFICER



9.1. The Data Protection Officer is Simon Santos. To contact the DPO, please email Roz@8foldgovernance.com.

10. CONTACT

10.1. Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to support@capturestroke.com