

Data Protection – Privacy Notice

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Introduction

Oceansblue are a cloud software service provider to NHS Trust. This notice applies to all our software platforms and services. In terms of GDPR (General Data Protection Regulations) specifications, as a business we are a Data Processor and NHS Trusts are our customers.

When we say 'personal data' we mean identifiable information about your employees, like their name, work email, work telephone number, work location, shifts worked, NHS grade, ESR number, NHS start date, support queries and so on.

Our work is performed under contract with NHS Trusts that includes Data Protection clauses.

Who are 'we' ?

When we refer to 'we' (or 'our' or 'us'), that means Oceansblue Limited, (Company number 4664762). Our offices are located at Regus Building, Central Boulevard, Blythe Valley Business Park, Solihull, West Midlands, B90 8AG, UK. This can also be found on our [Contact](#) page.

We provide an easy-to-use workforce planning and reporting platform for the UK National Health Service (NHS) and their employees. At the core of our platform is our cloud workforce intelligence software, including Barnacles, Periscope, Sentinel and Healthsense. If you want to find out more about us, see the ['what-we-do'](#) page.

For European Union data protection purposes, we act as a processor in relation to your personal data, (ICO - Data Protection Registration number Z3474778).

Our principles of data protection

Our approach to data protection is built around key principles. They're at the heart of everything we do relating to personal data.

Transparency: We take a human approach to how we process personal data by being open, honest and transparent.

Enablement: We enable connections and efficient use of personal data to empower productivity within the NHS.

Relevance: Personal data provided by our customers is always relevant to the tasks we are required to perform. Unnecessary information is removed before being uploaded onto the platforms.

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Security: We continuously work on new approaches to securing the personal data entrusted to us.

Stewardship: We accept the responsibility that comes with processing personal data.

How we collect data

We collect personal data from the following sources:

e-rostering system: Employee personal data is provided to us by our customers, NHS Trusts. This data is automatically transferred to us in a secure electronic file. As each new file is received it overwrites the previous file.

Electronic Staff Record: Limited personal data is provided to enable us to undertake data quality checks and management reports. This data is sent to us as a secure file by NHS Trusts, with new files overwriting previously held data.

Information we get from third parties: We may receive files from NHS appointed temporary staffing suppliers, such as NHSP. These files contain limited personal data relating to shifts that have, or will be, worked as a bank or agency shift.

Where we collect personal data, we'll only process it:

- to perform a contract with our NHS customers, or
- where we have legitimate reasons to process the personal data and they're not overwritten by your rights, or
- in accordance with a legal obligation, or
- where we have an individual's consent.

If an individual who doesn't have a direct relationship with us, believes their personal data has been supplied to us and wishes to have access, make changes or arrange removal of their data, they will be required to contact the relevant NHS Trust. As Data Controller, the relevant NHS Trust will manage access, changes, or removal of personal data as required. Any changes made by the NHS Trust will be reflected in the new updated file that is sent to us, which will overlay and replace previously held data.

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How we use the data

First and foremost, we use personal data to operate our cloud services in support of our contracts with our NHS customers. We also use personal data for other purposes, which may include the following:

To communicate with individuals or NHS Trust managers. This may include:

- providing information that has been requested from us (like reports, analysis materials, or presentations), or other information requested by our NHS customer.
- operational communications, like changes to our services, updates, or assistance with using our software and services.
- marketing communications (about Oceansblue, or other products and services we think you might be interested in) in accordance with any marketing preferences.
- asking for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

To support NHS customers: This may include assisting with the resolution of technical support issues or other issues relating to the services we provide, whether by email, in-app support or otherwise.

To enhance our software and services and develop new ones: For example, by tracking and monitoring our customer's use of our software and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise the user experience and provide more efficient tools.

To analyse, aggregate and report: We may use the personal data we collect and other users of our software and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports, which we may share with managers of NHS Trusts.

Sharing data

We will only share personal data with authorised users of our software platform, as specified by the relevant NHS Trust. This information will be shared:

- via correct User ID and Password to our cloud software
- via password encrypted reports
- Trust authorised non-sensitive reports via email
- With regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify our NHS customer of this type of disclosure

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- an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business
- other people where we have our NHS customer's consent.

International Data Transfers

We do not store or transfer personal data outside the United Kingdom. Our secure data centre is located in London.

Security

Security is a priority for us when it comes to personal data. We're committed to protecting personal data and have appropriate technical and organisational measures in place. For further information about security see Oceansblue security notice.

Retention

The length of time we keep personal data depends on the frequency of refreshed information sent to us by an NHS Trust. Our systems are set to accept a complete refresh of the data on a pre-determined schedule. Our normal practice is once per day, but some customers may increase this to intra-day, or reduce this due to internal IT operational reasons. This means personal data is refreshed and resupplied normally every day.

Should our NHS customers decide to discontinue using our software and service, all associated personal data will be deleted.

Marketing - Personal data rights

Oceansblue will occasionally promote products and services directly to current or prospective business customers using their personal business contact data.

A recipient can opt-out of marketing communications by following the unsubscribe instructions contained in the communication, or by sending a request to privacy@oceansblue.co.uk.

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Marketing recipients also have rights to:

- know what personal data we hold, and to make sure it's correct and up to date
- request a copy of their personal data, or ask us to restrict processing their personal data or delete it
- object to our continued processing of their personal data

These rights can be exercised at any time by sending an email to privacy@oceansblue.co.uk. If a current or prospective business customer is not happy with how we are processing their personal data, they should let us know by sending an email to privacy@oceansblue.co.uk. We will review and investigate the complaint and respond within a reasonable time frame.

How to contact us

If you have a question or feedback for us regarding this Privacy Notice, or our software or services, please do get in touch.

As a technology company, we prefer to communicate with you by email – this ensures that you're put in contact with the right person, in the right location, and in accordance with any regulatory time frames.

Our email is privacy@oceansblue.co.uk