**West Yorkshire Minuteful Kidney Hypertension Project – Privacy Policy.**

Healthy.io makes albumin to creatinine ratio (“ACR”) testing easier and more convenient, by allowing patients to test from home using a testing kit, and a smartphone app called Minuteful™ Kidney. The ACR test is one of the 9 NICE recommended annual care processes for patients living with diabetes.

An ACR test is part of a patient’s health care review if the patient has a chronic kidney disease (CKD) or is at risk of CKD (for example diabetes or hypertension). The test looks for particles of protein in urine called albumin. Carrying out a Minuteful™ Kidney ACR test allows the patient's doctor to identify and monitor the presence of albumin, which may suggest the first signs of CKD.

Before we can use Healthy.io to provide the service, Healthy.io undergoes a review by the NHS national team, then a further review takes place in each local area when Healthy.io works with a GP Surgery. In our area, this involved our Integrated Care Board reviewing Healthy.io's data processing methods through a standardised data processing risk assessment exercise which is defined under UK data protection legislation and NHS regulations; this review is carried out by the local ICB completing and signing off a Data Protection Impact Assessment (DPIA) on the Healthy.io service. Further to this, Healthy.io then goes on to work with GP Surgeries in our area, and prior to any personal data being shared with Healthy.io, we enter into a Data Processing Agreement; it is under the terms of the Data Processing Agreement, supported by the DPIA, that any personal data shared with Healthy.io is regulated.

The minimum amount of personal details is shared with Healthy.io to provide you with the Minuteful Kidney service. The personal data shared with Healthy.io are:

• Registered GP name, NHS number, main spoken language, gender, first name, last name, date of birth, email address, home phone number, mobile 40 phone number, address, ethnicity, diabetes type, CKD diagnosis and stage, date and value of last - ACR test.

• When you complete the test on your phone the following data is also processed: test date, test result, smartphone information (carrier, operating system, device, model, app version, city), app information (IP address).

The following is a summary of the relationships involved:

• Data Subject: Patient

• Data Controller: GP Surgery

• Data Processor: Healthy.io under a Data Processing Agreement to the GP Surgery.

• Sub Processor: A ‘Sub-processor’ is a trusted third-party data processor engaged by Healthy.io who has access to personal data. Healthy.io uses third party Sub-processors to provide elements of services (such as data hosting, posting out the test kits to your address and to send out service messages). Healthy.io has contracts in place with Sub-processors which ensures appropriate use of your data.

Healthy.io may store or process limited data about you in countries outside the UK. Most of the data processing is carried out in the UK, EEA or country with a UK Adequacy Regulation (such as Israel). However, in order for Healthy.io to provide you with the service, a limited amount of personal data may be processed in the US. Where data is processed outside of the UK or EEA, such as in the US, we will take the required steps to ensure that your personal data is protected to the standard and data transfer mechanisms required by UK Data Protection Law. Page 29 of 32 The lawful basis for processing is:

• Personal data: UK GDPR Article 6(1)(e): public task

• Special category data: UK GDPR Article 9(2)(h): Health or social care (with a basis in law)

• (The basis in law is the) Data Protection Act 2018: Schedule 1, Part 1: (2) Health or social care purposes

• Common Law Duty of Confidentiality (CLDC) is satisfied as this service is to support the provision of direct care. It should be noted that consent is not used for any part of the data processing for this service as the service supports the provision of direct care which satisfies the CLDC. However, patients have the right to object (commonly referred to as opting out or choosing not to take up the service). If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the GP Surgery.

As this service is to support the provision of direct care, the General Practice Data for Planning and Research (previously known as the type 1 opt out) and the National Data Opt-Out (previously known as the type 2 opt out) do not apply to this service.

Individual rights requests (such as Subject Access Request) are the responsibility of the GP Surgery. Any individual rights requests that are made directly to Healthy.io will be reported to the GP Surgery to process and confirm actions required to be taken by Healthy.io.

Healthy.io will store the data we share with them securely for the duration of the contract with us. If required by law, Healthy.io will keep your data for the minimum time required under the applicable law. The personal data that Healthy.io will retain after the end of the contract with us is any personal data related to complaints (complainant name, contact details and nature of complaint, and any other personal data that may be needed to manage the complaint) which Healthy.io are legally required to retain for 10 years under the applicable UK regulations that govern the product as a medical device.

When personal data is no longer required, Healthy.io will delete or anonymise data in line with Data Protection Legislation and appropriate industry guidance.