

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to IMS MAXIMS collecting/processing their personal data.
- 2.2 All Employees/Staff of IMS MAXIMS who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

IMS MAXIMS is a provider of high-quality patient administration systems and electronic patient record systems. Our solutions and services allow healthcare organisations to:

- reduce errors and deliver better, safer care
- improve outcomes for patients
- provide services more efficiently

3.2 What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our products and services, if relevant, includes:

- Personal and contact details, such as title, full name, contact details and contact details history
- Records of your contact with us such as discussions over the telephone or email or our online contact form which may include location data, IP Address and MAC address
- Details of our products and services that you or your organisation have, as well as information about any expression of interest in our products or services
- Details of the usage of our products and services, any related incident support calls logged online, by email or telephone or any other form of communications we support

3.3 What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly
- Information generated about you when you use our products and services
- Business partners (for example, 3rd party integration partners or other healthcare organisations), or others who are a part of providing your products and services or operating our business
- From publicly available directories and information (for example, telephone directory, social media, internet websites, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies
- Cookies are a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

3.4 What do we use your personal data for?

We use your personal data, including any of the personal data listed in 3.2 above, for the following purposes:

- Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms
- Managing the product or service you have with us
- Updating your records
- Managing any aspect of the product or service
- To perform and/or test the performance of, our products, services and internal processes
- To improve the operation of our business and that of our business partners
- To follow guidance and best practice under the change to rules of governmental and regulatory bodies
- For management and auditing of our business operations including accounting
- To monitor and to keep records of our communications with you and our staff
- To administer our good governance requirements and those of other members of the IMS MAXIMS Group, such as internal reporting and compliance obligations
- For market research and analysis and developing statistics

- For direct marketing communications and related profiling to help us to offer you relevant products and services, and/or keeping you informed of company updates and business news. We'll send marketing to you by SMS, email, phone, post, social media and digital channels (for example, using LinkedIn and Twitter and other social media channels). Offers may relate to any of our products and services as well as to any other offers and advice we think may be of interest
- To provide personalised content and services to you, such as tailoring our products and services, our digital customer experience and offerings, and deciding which offers or promotions to show you on our digital channels
- To develop new products and services and to review and improve current products and services
- To comply with legal and regulatory obligations, requirements and guidance
- To provide insight and analysis of our customers both for ourselves and for the benefit of business partners either as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our businesses
- To share information, as needed, with business partners (for example, 3rd party integrators) and service providers or as part of providing and administering our products and services or operating our business
- We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes.

3.5 What are the legal grounds for our processing of your personal information?

We are committed to collecting and using your information in accordance with applicable data protection laws.

We will only collect, use and share your information where we are satisfied that we have an appropriate legal basis to do this.

Contractual relationships

- Assessing an application for a product or service you wish to obtain from us, including consider whether or not to offer you the product, the price, the payment methods available and the conditions to attach to any offer
- Managing products and services you purchased from us, or an application for such
- Updating our records
- Sharing your personal information with trusted business partners and services providers when you apply for a product which includes any third-party product or integration with such
- All stages and activities relevant to managing the product or service including enquiry, application, administration, application support and management of accounts

Legitimate interest

IMS MAXIMS

Public

We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of "legitimate interests" as a justification for processing your personal information. Our legitimate interests for processing your personal information are:

- Managing your products and services relating to that, updating our records
- To perform and/or test the performance of, our products, services and internal processes
- To follow guidance and recommended best practice of government and regulatory bodies
- For management and audit of our business operations including accounting
- To carry out monitoring and to keep records of our communications with you and our staff
- To administer our good governance requirements and those of other members of IMS MAXIMS Group, such as internal reporting and compliance obligations
- For market research and analysis and developing statistics
- For direct marketing communications and related profiling to help us to offer you relevant products and services, and/or keeping you informed of company updates and business news. We will send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using, LinkedIn and Twitter and other social media channels)
- Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
- Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

Legal obligations

To comply with our legal obligations for example tax officials or law enforcement

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Where we are relying on consent, you may withdraw consent at any time by emailing DPO@imsmaxims.com or using the unsubscribe links in contact emails

3.6 Disclosure

We may pass your personal data on to third-party service providers contracted to IMS MAXIMS in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with IMS MAXIMS's procedures:

- IMS MAXIMS Group companies and service providers

- Business partners (for example, 3rd party integration partners or other healthcare organisations), or others who are a part of providing your products and services or operating our business
- Governmental and regulatory bodies such as Data Protection Commissioner, Irish Revenue, HMRC, the Financial Conduct Authority, the Ombudsman, and the
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
- Credit Reference and Fraud Prevention Agencies

3.7 Retention period

IMS MAXIMS will process personal data only for the purpose for which it was collected and will store the personal data in accordance with the retention criteria and period established in our retention period register.

3.8 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that IMS MAXIMS refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

3.9 Can I find out the personal data that the organisation holds about me?

IMS MAXIMS at your request, can confirm what information we hold about you and how it is processed. If IMS MAXIMS does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.

- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of IMS MAXIMS or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

What forms of ID will I need to provide to access this?

IMS MAXIMS accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months), etc.

All the above requests will be forwarded on should there be a third party involved (as stated in 3.6 above) in the processing of your personal data.

3.10 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by IMS MAXIMS (or third parties as described in 3.6 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and IMS MAXIMS's data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

	Supervisory authority contact details	Data Protection Officer (DPO) contact details
Contact Name:	Office of the Data Protection Commissioner	Terry Fossey
Address line 1:	Canal House	Saxon Court Offices
Address line 2:	Station Road	502 Avebury Boulevard
Address line 3:	Portllington	Central Milton Keynes



PRIVACY NOTICE

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Address line 4:	Co. Laois	MK9 3GD
Address line 5:	Ireland	
Address line 6	R32 AP23	
Email:	info@dataprotection.ie	dpo@imsmaxims.com
Telephone:	+353 (0761) 104 800 LoCall 1890 25 22 31	0203 66 86 999

Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all on the corporate web site

Signature:



Date: 05/02/2019

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	KDD	21/05/2018
2	Change of DPO and header details	TJF	05/02/2019