

INTRODUCTION

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Brain in Hand Ltd of Antrobus House, 18 College Street, Petersfield, Hampshire, GU31 4AD (registration number 06971006).

Please also see [INFORMATION GOVERNANCE & DATA PROTECTION FOR BRAIN IN HAND USERS](#)

INFORMATION WE MAY COLLECT

We may collect and process the following data about end users:

- Information provided by filling in forms on our site www.braininhand.co.uk and <https://secure.braininhand.co.uk> (our sites). This includes information provided at the time of registering to use our site, subscribing to our service or requesting further services. We may also ask for information when a problem with our site is reported.
- If an end user or their supporting organisation contacts us, we may keep a record of that correspondence.
- We may also ask users to complete surveys that we use for research purposes, although users do not have to respond to them.
- Details of visits to our site including, but not limited to, traffic data, location data, weblogs, operating system, browser usage and other communication data.

IP ADDRESSES AND COOKIES

We may collect information about any computer used to access our sites, including where available, IP addresses, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual and we will not collect personal information in this way.

We may obtain information about general internet usage by using a cookie file which is stored on computer hard drives. Cookies contain information that is transferred to a computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about preferences and to allow us to customise our sites according to individual interests.
- To speed up searches.
- To recognise users when they return to our sites.

End users may refuse to accept cookies by activating the setting on their browser which allows them to refuse the setting of cookies. However, if this setting is selected users may be unable to access certain parts of our sites. Unless users have adjusted their browser settings so that it will refuse cookies, our system will issue cookies when users log on to our site.

STORAGE OF PERSONAL DATA

- Our data is stored in an Azure SQL database. This is only accessible to two IP address outside of the Azure servers.
- We back the data up using SQL Azure's backup system with an additional nightly backup to a different Azure datacentre.
- The main database is in Ireland and the backups are held in the Netherlands (all within the EU).
- We keep users Personal Identification Data (PID) in a separate database to their activities/responses.
- Groups can share a database or if requested a group can be kept in their own database.
- When we remove a user, we have the option to purge all that user's information.
- Data downloads (for the purposes of reporting) is only done by named Brain in Hand staff and then it is via our internal tool.
- Apart from our database admin no one has direct access to the database.
- Any references to a specific user outside of the Brain in Hand system (for example in reports or emails to clients) is via a unique Identification Number (ID) so the user's PID remains secure.
- We do not use contractors who have access to our data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect personal data, we cannot guarantee the security of data transmitted to our site; any transmission is at a user's own risk. Once we have received information, we will use strict procedures and security features to try to prevent unauthorised access.

USES MADE OF THE INFORMATION

- To carry out our obligations arising from any contracts entered into with client organisations.
- To allow end users to participate in interactive features of our service when they choose to do so.
- To notify users about changes to our service.

DISCLOSURE OF INFORMATION

We may disclose personal information to third parties:

- If we are under a duty to disclose or share personal data to comply with any legal obligation, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

BRAIN IN HAND END USER CONFIDENTIALITY

The user has a secure login for their BIH website, they own their data and can decide who can have access to it. We inform users that specific staff can also view their websites (this is normally only for agreed support staff, the Project Manager and the traffic light responders).

Like many software applications, Brain in Hand works by making use of data stored on the user's smartphone and in the cloud. For us to provide this service, it is necessary to take occasional snapshots of data. We also use this data to improve our future products and services which we hope will benefit all users. To do this we do have access to user data on an anonymous basis.

We also recommend that the user protects their data by using a code or password on their smart device. If they lose their phone or smart device, they can access their BIH content again by logging in on an alternative device. If at any point the user would like all their data deleted, this can be facilitated by contacting Brain in Hand.

RETENTION OF USER INFORMATION

Personal information provided to process a Brain in Hand application is retained for seven years from last contact. It is stored within our internal secure system, Sharepoint, which is only accessible by authorised members of staff.

Personal information on the BIH secure system includes the user's name, email address and mobile phone number. Within the user's personal BIH website, the Profile page will include their address, emergency contact details and notes for traffic light response. Other pages contain information for their use of BIH. The BIH secure system is only accessible by authorised members of BIH staff and client system administrators where relevant.

When a user's licence is closed, their account is deactivated for the duration of the subscription period, to allow them to reinstate their account intact during that time. If their licence is not renewed, their website and account are deleted, no information would be retained. Reference Software licences with the Records Management Code of Practice for Health and Social Care 2016 <https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016>. Whilst client system administrators can deactivate user accounts, only authorised members of BIH staff can delete a user account.

END USER RIGHTS STATEMENT

The user has the right to ask us not to process their personal data for marketing purposes. We will usually inform them (before collecting your data) if we intend to use their data for such purposes or if we intend to disclose their information to any third party for such purposes. They can exercise their right to prevent such processing by checking certain boxes on the forms we use to collect their data. They can also exercise the right at any time by contacting us at admin@braininhand.co.uk.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If a user follows a link to any of these websites, they have their own privacy policies and we cannot accept any responsibility or liability for these policies. We advise users to the policies of other websites before submitting any personal to them.

END USER ACCESS TO INFORMATION STATEMENT

The Act gives the user the right to access information held about them and this right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing the user with details of the information we hold about them.