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1. About this Policy

1.1 Purpose

Connolly Hospital (CHB) is committed to ensuring the privacy and confidentiality of your personal information.

Connolly Hospital must comply with the General Data Protection Regulation (GDPR), which came in to force on 25th May 2018 and the Data Protection Acts 1988 to 2018. The 1988 Act was amended by the Data Protection (Amendment) Act 2003. The 2003 Amendment Act brought our law into line with the EU Data Protection Directive 95/46/EC. The Data Protection Act 2018 brought consequential amendments of certain other enactments and provided for any related matters. For more information see www.eugdpr.org

These legal frameworks ensure Connolly Hospital handles your personal information (including but not limited to patient health information).

The purpose of this Privacy Policy is to clearly communicate to you how Connolly Hospital handles your personal information. It will give you a better and more complete understanding of the type of personal information that Connolly Hospital holds about you and the way Connolly Hospital handles that information.

This Privacy Policy has been developed in accordance with a 'layered policy'. This means that it offers you the ability to obtain more or less detail about Connolly Hospital's information handling practices – depending on how much you wish to read, what you need to know and how quickly you need to obtain the relevant information.

If you only require basic information about Connolly Hospital's information handling practices, you can view our 'condensed' privacy policy. This is a summary of how Connolly Hospital collects, uses and discloses your personal information and how you can contact

Connolly Hospital if you would like to access or request a correction to any personal information which Connolly Hospital holds about you.

If you require more detailed information about Connolly Hospital's information handling practices, then you will need to read this document.

1.2 Information Governance

Information Governance is the set of standards we must follow in handling personal healthcare records. Good information governance means that all personal health information is handled legally, securely, efficiently and effectively in order to deliver the best possible care to people who use our services. It also includes sharing of relevant personal health information with our healthcare providers where appropriate.

What does it involve?

- We must manage our records effectively. This means that information should be accurate, up to date and accessible when it is needed.
- We must ensure that information is kept securely and is accessed only by those who should be accessing it.
- We must protect the confidentiality of the information - information provided in confidence should not be used or disclosed in a way that might identify an individual without a legal basis for processing.
- Patients have a right to access health information about themselves - Please see section 1.8 below

1.3 What personal information you hold

In order to provide you with the highest quality of healthcare, we need to keep records about you. These records may include:

- Personal information such as your name, address, date of birth, next of kin.
- Contact we have had with you, such as clinic visits and hospital admissions.
- Notes and reports about your health and details of any treatment and care you need or have received either from us or from other healthcare providers, such as your GP, primary care team, other hospitals, community health organisation/services and pharmacy.
- Results of investigations such as X-rays and laboratory tests.

1.4 What will we use your information for?

The people who provide healthcare to you will use your records to:

- Confirm your identity when we contact you, or when you contact us.
- Make decisions about your on-going care and treatment.
- Make sure your care is safe and effective.
- Check the quality of your care.
- To ensure a safe care journey through our hospital and onto other care providers if/when required.
- While the primary purpose of the hospital is the treatment of patients, the hospital is also an institute of learning and innovation for clinical staff and conducts research in support of the continued development of future health treatments. (All research conducted is subject to specific patient consent.)

1.5 Do I have a choice?

No. If you wish to receive safe and appropriate care and treatment at our hospital we must maintain an accurate record of relevant information about you. However, if you have any concerns about providing information or how we share this information with other healthcare providers, please contact the General Manager's office on Ph: 01 646 5179

1.6 Do you share information about me with anyone?

Yes, as part of your continuing care we may also share relevant information about you with other relevant organisations who may be involved in your care at some point. For example:

- Other hospitals that are involved in your care and treatment
- Your GP
- Community Healthcare Organisations and their services
- Local authorities
- Primary Care
- Pharmacy

When we do share information with other organisations involved in your care, we do so under a formal agreement about how it will be used and kept confidential.

We will not disclose your information to any other third parties without your permission unless there are exceptional circumstances, such as if the health and safety of yourself or others is at risk or if there is a legislative requirement for us to do so.

Relevant information about you may also be used to help us to:

- Manage finances e.g. billing and costings
- Teach and train our staff
- Manage and plan our services
- To perform clinical audits
- Help investigate concerns or complaints that you or your family may have about your healthcare

Wherever possible we use information that would not identify you personally (anonymous information).

1.7 Using your information for research?

Research has a vital role to play in the development of healthcare and health service delivery. Connolly Hospital is an academic teaching hospital associated with the Royal College of Surgeons in Ireland (RCSI) and we support and promote research activity within the Hospital. Our Research Ethics Committee must approve research before it takes place. If we wish to use your personal information for research then we will ask you for permission first. You will not be identified in any published results without your prior agreement.

All research must comply with the legal framework contained in the Data Protection Act 2018 (Section 36(2)) (Health Research) Regulations 2018.

1.8 Can I see the information you hold about me?

Yes. You have the right to access any identifiable information we hold about you. You can request this information through Administrative access (your own records), The Freedom of Information Act, General Data Protection Regulation and the Data Protection Acts also allow you to find what information is held about you on computer and in certain paper records.

Please see the relevant forms for requesting information on our website:

www.connollyhospital.ie

If you wish to request a copy of your personal healthcare records, please contact:

Administrative access requests: If requesting your own records

By email: brenda.moran@hse.ie

By letter:

Brenda Moran
Administrative Access Officer
Medical Records Building
Connolly Hospital
Mill Road
Abbotstown
Dublin 15
15 X40D

Freedom of information requests and data protection requests:

By email: patientservices.chb@hse.ie

By letter:

Quality & Safety Department
Administration Building
Connolly Hospital
Mill Road
Abbotstown
Dublin 15
15 X40D

1.9 Current version

This Privacy Policy was last updated in February 2019 and may change from time to time. The most up-to-date copy will be published on the Connolly Hospital website or can be obtained by contacting us on the details set out at the end of this policy.

2 How Connolly Hospital Handles your Personal Information

2.1 Connolly Hospital's Legal Obligations

As mentioned in Part 1 of this Privacy Policy, Connolly Hospital is required to comply with the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988, 2003 (as amended) and 2018. As part of this we are regulated by the Office of the Data Protection Commissioner (ODPC) and acts as Connolly Hospital's Supervisory authority.

By letter:	Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2,
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	D02 RD28, Ireland.	
By email:	info@dataprotection.ie	
Website:	dataprotection.ie	
By telephone:	+353 578 684 800	09:15 – 17:30hrs (17:15 Friday)
	+353 761 104 800	

The ODPC is an independent public authority which regulates how Connolly Hospital may collect, use, disclose and store personal information and how individuals may access and correct personal information which Connolly Hospital holds about them. For ease of reference, this Privacy Policy sets out Connolly Hospital’s position with respect to patient and other individuals’ personal information separately but we treat each group equally.

2.2 Terms Used

In this Privacy Policy, we use the terms:

“**Personal data**” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person:

“**Data concerning health**” means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

“**Primary purpose**” means the specific function or activity for which the information is collected. Any use or disclosure of the personal information for another purpose is known as the “secondary purpose”.

“**Processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**Pseudonymisation**” means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

“**Controller**” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

“Processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

“Consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

“Personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

“Binding corporate rules” means personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity.

“Supervisory authority” means an independent public authority which is established by a Member State pursuant to Article 51.

2.3 Who does Connolly Hospital collect information from?

This Privacy Policy applies to Connolly Hospital’s collection and use of personal information from patients, visitors, next-of-kin, nominated support persons, referring doctors, all staff both clinical and support services such as Accredited Health Professionals, contracted health professionals, trainees (including medical professionals including registrars, fellows and advanced trainees), approved researchers, students undertaking training placements in our facilities, contractors, suppliers, and service providers engaged by us, medical representatives attending our facilities and other individuals engaged by or providing services to Connolly Hospital.

2.3.1 Patients

In order to provide you with the required health care services Connolly Hospital will need to collect and use your personal information.

2.3.2 Other Individuals

In order to enable Connolly Hospital to engage with you for the relevant primary purpose, Connolly Hospital may need to collect and use your personal information. If you provide incomplete or inaccurate information to us or withhold personal information from us we may not be able to engage with you as required to meet that primary purpose.

2.4 What information does Connolly Hospital collect?

2.4.1 Patients

We collect personal information from you that is reasonably necessary to provide you with health care services and for administrative and internal business purposes related to your attendance at Connolly Hospital.

Often this may include collecting information about your health history, family history, your ethnic background or your current lifestyle to assist the health care team in diagnosing and treating your condition.

We will usually collect your health information directly from you. Sometimes we may need to collect information about you from a third party (such as a relative or another health service provider).

Your personal information which may include diagnostic data will be taken during your engagement with the hospital for the purpose of assisting or recording developments in

your treatment. This data may take many forms for example standard laboratory information, sleep studies, image information from areas such as radiology and endoscopy. Connolly Hospital will, in all cases, manage your personal information contained in these clinical images in accordance with the General Data Protection Regulation and this Privacy Policy.

2.4.2 Other individuals

We collect personal information from you that is reasonably necessary to engage with you for the primary purpose, including the provision of services by Connolly Hospital, for Connolly Hospital's functions or activities and for administrative and internal business purposes related to your dealings with Connolly Hospital.

We will usually collect your personal information directly from you. Sometimes we may need to collect information about you from a third party; however we will only do this where it is not reasonable or practical for us to collect this information directly from you.

2.5 How does Connolly Hospital Store your information?

Connolly Hospital may store the personal information we collect from you in various forms. Connolly Hospital will comply with the GDPR, and this Privacy Policy, in respect of your personal information in whatever form that information is stored by us.

2.5.1 Patients

Storage of personal information may be in physical (paper) form and may also include storage through electronic systems for storage of personal information (including clinical images taken for diagnostic or treatment purposes) on some diagnostic equipment where you have undergone a diagnostic procedure using such equipment in Connolly Hospital.

2.5.2 Individuals

Personal information may be stored in various forms including electronic and/or paper systems in accordance with usual practices, and subject to the purposes of your engagement with Connolly Hospital.

2.6 How does Connolly Hospital use your information?

Connolly Hospital only uses your personal information for the primary purpose for which you have given the information to us, unless one of the following applies:

The secondary purpose is related (or for sensitive information, **directly** related) to the primary purpose for which you have given us the information and you would reasonably expect, or we have told you, that your information is usually disclosed for another purpose or to other individuals, organisations or agencies (see related secondary purposes set out below);

- you have consented for us to use your information for another purpose, for example research;
- Connolly Hospital is required or authorised by law to disclose your information for another purpose (see related secondary purposes set out below);
- the disclosure of your information by Connolly Hospital will prevent or lessen a serious and/or imminent threat to somebody's life, health or safety or to public health or public safety; or
- the disclosure of your information by Connolly Hospital is reasonably necessary for the enforcement of a criminal law or a law imposing a penalty or sanction, or for the protection of public revenue.

Connolly Hospital may use or disclose your personal information as specified above via electronic processes, where available or relevant.

Related secondary purposes include:

The following is a list of examples of related secondary purposes for which Connolly Hospital may use your personal information, but it is not an exhaustive list.

Patient specific examples:

(a) Use among health professionals to provide your treatment

Modern health care practices mean that your treatment will be provided by a multi-disciplinary team of health professionals working together.

You may be referred for diagnostic tests such as pathology or radiology and our staff may consult with senior medical experts when determining your diagnosis or treatment. With developments in technology (e.g. telemedicine) our staff may consult with health professionals and medical experts, both public and private, located remotely, including outside Connolly Hospital, in relation to your diagnosis or treatment, including by sending health information and clinical images electronically. Our staff may also refer you to other health service providers, both public and private, for further treatment during and following your admission (for example, to a physiotherapist or outpatient community health services).

We may disclose your personal information to the relevant provider to the extent required for any such referral (including disclosing that information electronically).

Your personal information will only be disclosed to those health care workers involved in, or consulted in relation to, your treatment and associated administration and to the extent required to meet that purpose.

These health professionals will share your personal information as part of the process of providing your treatment.

We will only do this while maintaining confidentiality of this information and protecting your privacy in accordance with the law.

As part of your care, we may be required to disclose your information to third party medical suppliers for the purpose of ordering specific products or to enable appropriate follow up, for example, if you require prosthesis, certain pharmaceutical treatments or other medical implantable products as part of your treatment.

(b) Assessment for provision of health care services

Connolly Hospital may collect your personal information for the purpose of assessing your suitability for health care services at a Connolly Hospital. Where personal information is collected and you do not become a patient of the hospital, your personal information may be retained. Where your assessment has been conducted at the request of your GP, Connolly Hospital will report the outcome of the assessment to that GP as it may be relevant to any on-going treatment or care provided to you by them.

Where you undergo assessment or treatment by a third party provider during your admission to Connolly Hospital for the purpose of transferring your care to that third party, Connolly Hospital may disclose your personal information to the third party provider for that purpose.

(c) Your local doctor

Connolly Hospital will usually send a discharge summary to your referring medical practitioner or nominated general practitioner following an admission. This is in accordance with international norms and long-standing medical practice and is intended to inform your doctor of information that may be relevant to any on-going care or treatment provided by them. This discharge summary may be sent to your referring medical practitioner or general practitioner electronically.

If your nominated general practitioner has changed or your general practitioner's details have changed following a previous admission, you must let us know.

(d) Other health service providers

If in the future you are being treated by a medical practitioner or health care facility that needs to have access to the health record of your treatment, we will provide a copy of your record to that medical practitioner or health care facility and ensure this request is processed in the correct manner. We may provide information about your health records to another medical practitioner or health facility outside Connolly Hospital without your consent in the event of an emergency where your life or health is at risk.

(e) Students and trainees

Connolly Hospital supports the placement of students and trainees at Connolly Hospital and these students and trainees may have access to your personal information for the purpose of the placement. Students and trainees on placement at Connolly Hospital are required to comply with the GDPR (or other relevant privacy legislation) and our Privacy Policy.

(f) Relatives, guardian, close friends or legal representative

We may provide information about your condition to your spouse or partner, parent, child, other relatives, close personal friends, guardians, or a person exercising your power of attorney under an enduring power of attorney or who you have appointed your enduring guardian, unless you tell us that you do not wish us to disclose your personal information to any such person.

(g) Other common uses

In order to provide the best possible environment in which to treat you, we may also use your personal information where necessary for:

- activities such as quality assurance processes and service evaluations to assess standards of care, accreditation, clinical audits, risk and claims management, patient experience and satisfaction surveys and staff education and training;
- invoicing, billing and account management, including storage of provider details on Connolly Hospital billing software;
- the purpose of complying with any applicable laws – for example, in response to a subpoena or compulsory reporting to State authorities (for example, National Cancer Registry);
- the purpose of sending you standard reminders, for example for appointments and follow-up care, by text message or email to the number or address which you have provided to us; and
- we may anonymise or aggregate the personal information that we collect for the purpose of service management; monitoring, planning and development.

- To identify patients that might be suitable for clinical trials/research. Any participation in a trial or research study will require your consent.

(h) Other uses with your consent

With your consent we may also use your information for other purposes such as including sharing your information with your insurance company and research.

Other non-patient specific examples:

(i) CCTV

Connolly Hospital does use camera surveillance systems (commonly referred to as CCTV) throughout our organisation for the purpose of maintaining the safety and security of its staff, patients, visitors and other attendees. Connolly Hospital's CCTV systems may, but will not always, collect and store personal information. Connolly Hospital will comply with the GDPR and this Privacy Policy in respect of any personal information collected via its CCTV systems.

(j) Contractors under agreement

Connolly Hospital may provide, or allow access to, personal information to contractors engaged to provide professional services to Connolly Hospital (e.g. Information Communication Technology providers) or to contractors to whom aspects of our services are outsourced. Where we outsource any of our services or hire contractors to perform professional services within our hospital this will be done as part of a Service Provider Agreement which contains a Data sharing component that complies with the GDPR and where applicable our Privacy Policy.

(k) Application for accreditation by health professionals

Connolly Hospital collects personal information from health professionals seeking accreditation and submitting to the credentialing process. Personal information provided by health professionals in this context is collected, used, stored and disclosed by Connolly Hospital for the purposes of fulfilling its obligations in connection with the accreditation sought.

(l) Job applications

Connolly Hospital collects personal information of job applicants who have responded to an advertised position for the primary purpose of assessing and (if successful) engaging applicants. The purpose for which Connolly Hospital uses personal information of job applicants includes:

- managing the individual's employment, engagement or placement;
- insurance purposes; and
- ensuring that it holds relevant contact information.

Connolly Hospital may also store information provided by job applicants who were unsuccessful for the purposes of future recruitment or employment opportunities.

(m) Students / Trainees

Connolly Hospital collect personal information of students or trainees on placement for the primary purposes of providing the placement and facilitating assessment. The purposes for which Connolly Hospital uses personal information of students or trainees include:

- managing the individual's placement;
- ensuring the quality and safety of clinical care provided to Connolly Hospital patients;
- insurance purposes;
- ensuring that it holds relevant contact information; and
- satisfying its legal obligations including obligations under any placement agreement.

Connolly Hospital may also store information provided by students or trainees following placement for the purpose of future recruitment or employment opportunities.

(n) Education and community engagement

Connolly Hospital may offer opportunities for health practitioners to participate in educational events or seminars for the purpose of continuing professional development or community engagement. When you register for or attend an event, Connolly Hospital may collect your personal information for the purpose of providing the service and recording your attendance.

Connolly Hospital may disclose your personal information to third parties for the purpose of confirming your attendance at the event including the provision of attendance records or certification.

2.7 Access to and correction of your personal information

You have the right to have access to the personal information that we hold about you (for patients, this includes health information contained in your health record). You can also request an amendment to personal information that we hold about you should you believe that it contains inaccurate information. The request will be reviewed with the relevant parties.

Connolly Hospital will allow access or make the requested changes unless there is a reason under the GDPR or other relevant law to refuse such access or refuse to make the requested changes.

If we do not agree to change your personal information in accordance with your request, we will permit you to make a statement of the requested changes and we will enclose this with your personal information.

Should you wish to obtain access to or request changes to your personal information held by Connolly Hospital, please contact:

Administrative Access (your own records): brenda.moran@hse.ie

Freedom of Information / Data protection: patientservices.chb@hse.ie

2.8 Data Quality

Connolly Hospital will take reasonable steps to ensure that your personal information which we may collect, use or disclose is accurate, complete and up-to-date.

2.9 Data Security

Connolly Hospital will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. We use technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect your privacy.

2.10 Cross border disclosure

Connolly Hospital may enter into arrangements with third parties to store data we collect or to access the data to provide services (such as data processing), and such data may include personal information, outside of the EEA. Connolly Hospital will take reasonable steps to ensure that the third parties do not break the GDPR requirements. The steps Connolly Hospital will take may include ensuring the third party is bound by privacy protection obligations which are the same (or substantially the same) as those which bind Connolly Hospital and requiring that the third party has information security measures in place which are of an acceptable standard and approved by Connolly Hospital.

3 How to contact Connolly Hospital about privacy issues

If you have questions or comments about this Privacy Policy, you can contact us:

By Letter:

General Manager's Office
Administration Building
Connolly Hospital
Mill Road
Abbotstown
Dublin 15
15 X40D

By telephone: 01 646 5179

3.1 Complaints

If:

1. Connolly Hospital does not agree to provide you with access to your personal information, or
2. You have a complaint about our information handling processes

You can lodge a complaint with or contact the General Manager's office on the details above or directly with the Office of the Data Commissioner. Full contact details can be found in section 2.1 above or on their website www.dataprotection.ie

4. How Connolly Hospital handles your Personal information when you visit our website

This section of our Privacy Policy explains how we handle your personal information which is collected from our website: www.connollyhospital.ie (collectively **website** hereafter)

4.1 Collection

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information about you unless you specifically provide this to us. Sometimes, we may collect your personal information if you choose to provide this to us via an online form or by email, for example if you:

- submit a general enquiry

- register for an event or request information, or
- send a written complaint or enquiry to our privacy officer

4.2 Cookies

A "cookie" is a small bit of data our server sends to your browser that allows our server to identify and interact more effectively with your computer. Cookies do not identify individual users, but they do identify your ISP and your browser type.

This website uses temporary cookies. This means that upon closing your browser, the temporary cookie assigned to you will be destroyed and no personal information is maintained which will identify you at a later date.

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with this website and who are under obligations of confidentiality. You can configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the Connolly Hospital website and other websites may be lost.

4.3 Links to third party websites

We may create links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from our website.

4.4 Use and disclosure

We will only use personal information collected via our website for the purposes for which you have given us this information.

We will not use or disclose your personal information to other organisations or anyone else unless:

- you have consented for us to use or disclose your personal information for this purpose
- you would reasonably expect or we have told you (including via this policy) that your information is usually or may be used or disclosed to other organisations or persons for a related (or for sensitive information) or directly related purpose
- the use or disclosure is required or authorised by law
- the use or disclosure will prevent or lessen a serious and/or imminent threat to somebody's life, health or safety or to public health or public safety, or
- the disclosure is reasonably necessary for law enforcement functions or for the protection of public revenue

If we receive your email address because you sent us an email message, the email will only be used or disclosed for the purpose for which you have provided and we will not add your email address to an emailing list or disclose this to anyone else unless you provide us with consent for this purpose.

4.5 Data Quality

If we collect your personal information from our website, we will maintain and update your information as reasonably practical and necessary or when you advise us that your personal information has changed.

4.6 Data Security

Connolly Hospital is committed to protecting the security of your personal information. We use technologies and processes such as access control procedures, network firewalls,

encryption and physical security to protect the privacy of information. We will take all reasonable steps to prevent your information from loss, misuse and alteration.

5 Retention Periods

Health records at Connolly Hospital are held in accordance with the 2013 Health Service Policy issued by the HSE. This policy should be read in conjunction with the HSE's Standards and Recommended Practices for Healthcare Records Management and the HSE's National Financial Regulation Retention of Financial Records. Together, these policies help ensure that Connolly Hospital is maintaining necessary records for an appropriate length of time. This is a controlled document by the HSE and is subject to change at any time.