

## **Inner Southwest London LOC Privacy Notice**

### **1. Who we are**

**Inner Southwest London LOC** (“we”, “us”, “the LOC”) is the Local Optical Committee for the area covered by the London Boroughs of Merton, Sutton, Wandsworth, Richmond & Kingston. We are a statutory body representing local NHS General Ophthalmic Services (GOS) contractors and performers. We support engagement with NHS England, coordinate training, share sector updates, and carry out LOC governance functions. We are a **Data Controller** for the personal data we process; details for the Data Protection Lead (DPL) who coordinates compliance are as follows:

- **Role:** ISWL LOC lay Secretary has been allocated this responsibility of the Data Protection Lead
- **Email:** ISWL LOC lay Secretary: [laysec@iswlloc.com](mailto:laysec@iswlloc.com)

**Note:** the DPL is not a statutory Data Protection Officer (DPO).

### **2. About this Privacy Notice**

This Privacy Notice explains:

- what personal data we collect
- why we collect it and how we use it
- the lawful bases we rely on
- how long we keep your information
- who we share data with
- international transfers
- your rights
- how to complain (including DUAA 2025 routes)
- the circumstances where we may transfer data to a new legal entity.

This Privacy Notice applies to:

- local GOS contractors and performers
- training and event attendees
- people who contact the LOC

- website users

**Note:** the LOC does **not** process patient data.

### 3. The personal data we collect and how we use it

#### 3.1 Summary table

Below is a table setting out:

- what we collect
- why we collect it (purpose)
- the lawful basis
- how long we keep it.

| Data Category                                 | Purpose                                                                  | Lawful Basis (UK GDPR / DPA 2018 / PECR)                  | Retention Period                        |
|-----------------------------------------------|--------------------------------------------------------------------------|-----------------------------------------------------------|-----------------------------------------|
| Contractor/performer name and contact details | Statutory functions; communications about pathways, governance, training | Legitimate Interests; Public Task (where applicable)      | Until superseded or no longer required  |
| Event/training registrations and attendance   | Administering events and professional development                        | Legitimate Interests; Consent (if optional comms)         | 2 years                                 |
| Email addresses for optional newsletters      | Providing updates where consent is required                              | Consent (PECR)                                            | Until consent withdrawn                 |
| Website analytics, cookies                    | Website optimisation                                                     | Legitimate Interests; Consent (for non-essential cookies) | 12–24 months                            |
| Communications preferences                    | Managing opt-outs and consent                                            | Legal Obligation; Consent                                 | Until superseded                        |
| Photographs from events                       | Marketing and LOC communications                                         | Consent                                                   | Until withdrawn or review every 3 years |

|                                                     |                         |                      |        |
|-----------------------------------------------------|-------------------------|----------------------|--------|
| Enquiry details submitted via email or contact form | Responding to enquiries | Legitimate Interests | 1 year |
|-----------------------------------------------------|-------------------------|----------------------|--------|

#### 4. Where we obtain personal data from

We collect data:

- directly from you (email, forms, event registrations, AGM attendance)
- from NHS England where contractor or performer lists are supplied
- from LOCSU (where required for governance support)
- through website analytics and cookies
- from publicly available professional contact information.

**Note:** the LOC does **not** collect data from children or process sensitive health information.

#### 5. How we use your information

We use your personal data to:

- carry out our statutory role as the Local Optical Committee
- communicate with local contractors and performers
- provide updates on NHS pathways, training and local service development
- organise meetings, training and events
- carry out governance (elections, AGMs, minutes)
- manage stakeholder relationships
- administer finances, commissioning engagement and LOC operations
- respond to enquiries,
- maintain our website, digital systems and mailing lists.

#### 6. Lawful bases we rely on

Depending on the activity, we rely one, or more, of the following bases as outlined in 6.1 to 6.3.

## **6.1 Legitimate Interests**

For most LOC activities including:

- communications with contractors/performers
- managing governance and committee activities
- running meetings, training, engagement and stakeholder work.

We ensure these interests are balanced against your rights.

## **6.2 Public Task / Legal Obligation**

For statutory functions such as:

- AGM notices
- elections
- levy management
- reporting required by NHS England.

## **6.3 Consent**

Used only where required by PECR or ICO guidance, e.g.:

- optional newsletters to non-contractors
- use of photographs
- certain event marketing
- non-essential cookies.]

Where we require your consent, and you give us consent, you may withdraw consent at any time. [For example, if you consent to us sending you newsletter, you can unsubscribe by clicking the link in the email. If you have consented to us processing your data for another purpose, you can withdraw consent by contacting us at [lociswl@gmail.com](mailto:lociswl@gmail.com) and with the word “unsubscribe” typed in the subject line or the text of the email.

## **7. Marketing communications and consent management**

We may send information on:

- essential operational updates

- NHS pathways
- training and local events
- sector updates relevant to contractors and performers.

This information falls under **Legitimate Interests** or **Public Task**.

If the LOC publishes optional newsletters or wider communications, we will gain **consent** as required by PECR, which is:

- specific
- informed
- freely given
- recorded and auditable
- easy to withdraw at any time (each communication will include an unsubscribe link).

## 8. Who we share your information with

We may share data with:

- LOCSU
- NHS England regional teams
- local patient committees or ICS groups
- training providers
- website or IT system suppliers
- professional optical bodies (ABDO, FODO, AOP) where appropriate
- accountants, auditors or administrative service providers

In certain circumstances we will be required to disclose personal data. Examples include:

- In an emergency situation (e.g. life or death) – i.e. to protect the vital interest of an individual(s).
- In the interest of national security.
- To prevent or detect crime, including the apprehension or prosecution of offenders.
- To prevent serious harm to an individual(s) – e.g. a health and safety concern.

**Note:** We do **not** sell data or allow third parties to use it for their own marketing.

All partners and/or parties we disclose information to must keep your information secure and follow UK GDPR requirements.

## **9. International transfers**

Some cloud services may store data outside the UK. Where this happens, the LOC ensures:

- a UK adequacy decision applies, **or**
- Standard Contractual Clauses / IDTA Addendum are in place, **or**
- a Transfer Risk Assessment has been completed.

**Note:** we will **not** transfer data internationally unless appropriate safeguards exist.

## **10. How we keep your data secure**

We have appropriate physical and technical security measures in place to protect your personal data. We ensure that we have provisions in place to ensure that only authorised people have access to personal data, that your data is kept secure, and that we have processes and procedures in place to prevent accidental loss, destruction, alteration, unauthorised access or disclosure of your personal data.

We have incident and breach processes and procedures in place to deal with and respond to any suspected breaches of your personal data and will notify you and any relevant regulators in the event of a breach where we are required to do so. Measures we have in place include:

### **10.1 Technical measures**

The LOC uses appropriate measures such as:

- password-protected devices
- encrypted storage
- secure cloud-based systems (e.g. Microsoft 365)
- limited access controls
- secure email where appropriate.

### **10.2 Organisational measures**

- confidentiality agreement for all committee members

- clear desk and secure storage practices
- use of LOC email accounts for LOC business
- regular review of access permissions
- archiving and deletion in line with retention schedule.

## **11. Rights of individuals (Data Subject Rights)**

Under UK GDPR and the Data Protection Act 2018 you have the right to:

- access your data (Subject Access Request)
- rectify inaccurate information
- erase your information (in certain circumstances)
- restrict processing
- object to processing
- withdraw consent (where consent is used)
- data portability (where applicable)
- be informed about how your data is used (this notice).

You can exercise your rights by making a request to us by post, email, telephone, in-person, or online.

## **12. Automated decision making and profiling**

We do not use automated decision-making or profiling.

## **13. Cookies**

A cookie is 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.

Our website uses cookies as set out below

| Cookie Category | Purpose | Lawful Basis (UK GDPR / DPA 2018 / PECR) |
|-----------------|---------|------------------------------------------|
|-----------------|---------|------------------------------------------|

|               |                       |                     |
|---------------|-----------------------|---------------------|
| Essential     | Website functionality | Legitimate Interest |
| Non-essential | Analytics/ Marketing  | Consent             |

Specific cookies used:

- Google Analytics
- Cookie consent plugin
- Logged in users

Where we use tracking, we will ask you to consent to our use of cookies when you first visit our website. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser and we suggest consulting the Help section of your browser.

#### **14. Transfer of data to another legal entity**

If the LOC is subject to a restructure, merger, or transfer of functions:

- personal data may be transferred to a new lawful successor organisation
- you will be notified in advance where possible
- the recipient must comply with all UK data-protection laws
- the purposes of processing will remain aligned with statutory LOC functions.

#### **15. Your right to complain (UK GDPR and DUAA 2025)**

You can raise concerns or complaints in the following ways:

##### **15.1 To the LOC (first step)**

**Email:** [lociswl@gmail.com](mailto:lociswl@gmail.com)

##### **15.2 To the ICO (UK's supervisory authority)**

**Website:** [www.ico.org.uk](http://www.ico.org.uk).

##### **15.3 Under the DUAA 2025**

You have a statutory right to complain about:

- poor data handling
- failure to meet data-subject rights
- misuse or incorrect access to your data
- poor fairness, accuracy, or transparency in data use.

Regulators must investigate complaints unless they are frivolous or vexatious. You can raise a DUAA complaint:

- through the LOC
- through the ICO (who must consider the DUAA requirements).

## **16. Changes to this Privacy Notice**

We may update this notice periodically. The latest version will always be available on our website. Where changes are material, we will notify you.