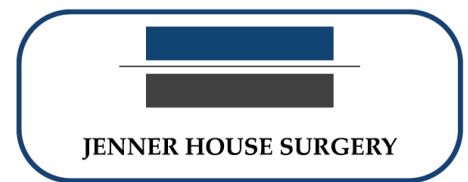


# Data Protection by Design and Default Declaration



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Jenner House Surgery has put in place measures to implement the General Data Protection Regulation and its constituent principles as well as to safeguard individual's rights under its legislation. Data Protection will be at the forefront of our values and integrated into our processes and business practice.

Jenner House Surgery will:

- Consider data protection issues as part of the design and implementation of systems, services, products and business practices.
- Make data protection an essential component of the core functionality of our processing systems and services.
- Anticipate risks and privacy-invasive events before they occur, and take steps to prevent harm to individuals.
- Only process the personal data that we need for our purposes(s), and that we only use the data for those purposes.
- Ensure that personal data is automatically protected in any IT system, service, product, and/or business practice, so that individuals should not have to take any specific action to protect their privacy.
- Provide the identity and contact information of those responsible for data protection both within our organisation and to individuals.

**Information Governance Lead:** Dr Ku Rama

**Caldicott Guardian:** Dr Ku Rama

**Senior Information Risk Owner:** Marie Edwards

**Data Protection Officer:** Caroline Sims

- Adopt a 'plain language' policy for any public documents so that individuals easily understand what we are doing with their personal data.
- Provide individuals with tools so they can determine how we are using their personal data, and whether our policies are being properly enforced.
- Offer strong privacy defaults, user-friendly options and controls, and respect user preferences.
- Only use data processors that provide sufficient guarantees of their technical and organisational measures for data protection by design.
- When using other systems, services or products in our processing activities, we make sure that we only use those whose designers and manufacturers take data protection issues into account.
- Use privacy-enhancing technologies (PETs) to assist us in complying with our data protection by design obligations.