Website Policy Pack

Privacy, cookies, data protection, clinical safety and acceptable use

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Business address	46 Claughton Street, St Helens, WA10 1SN
Version date	7 September 2026

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Important: The healthcare organisation or clinician using EPR Connect will normally remain responsible for the clinical purpose and lawful basis of patient-data processing. EPR Connect will often act as a processor for those records, while acting as controller for its own account, billing, security and business-administration data.

1. Privacy Notice

Last updated: 7 September 2026

1. About EPR Connect

EPR Connect provides digital healthcare software designed to support healthcare professionals and organisations with patient administration, appointment management, electronic patient records, clinical documentation, referrals, waiting lists, correspondence and related healthcare workflows.

For the purposes of UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, EPR Connect may act as either a data controller or a data processor, depending on the circumstances.

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ICO registration number: TBC

2. Our role when processing patient information

Where a healthcare organisation, clinic or healthcare professional uses EPR Connect to manage patient information, that healthcare provider will normally be the data controller. EPR Connect will normally act as a data processor, processing patient information on the healthcare provider's documented instructions.

The healthcare provider remains responsible for determining why patient information is processed, the lawful basis for processing it and how long the information should be retained. EPR Connect does not acquire ownership of patient clinical records.

3. Information we may process

Depending on how the platform is used, EPR Connect may process information including:

- name, address and contact details
- date of birth and demographic information
- NHS number or other patient identifiers
- appointment and attendance information
- medical and clinical information
- diagnoses, treatment information and clinical history
- medication and prescription information
- referrals and waiting-list information
- clinical notes
- correspondence and clinical letters
- investigation and treatment outcomes
- uploaded documents and images
- healthcare professional information
- account and login information
- audit logs and system activity

- technical and device information
- communications with EPR Connect

> Health information is special category personal data and is subject to additional protection under UK data protection law.

4. Why information is processed

Personal information may be processed through EPR Connect for purposes including:

- providing electronic patient record functionality
- facilitating patient registration
- managing appointments
- recording clinical consultations
- supporting referrals and waiting lists
- creating clinical documentation and correspondence
- maintaining accurate healthcare records
- providing clinicians with information required to provide care
- maintaining system security and detecting unauthorised access
- maintaining audit trails
- providing technical support
- administering customer accounts
- meeting legal and regulatory requirements
- improving the reliability, security and functionality of the platform

5. Lawful basis

When EPR Connect processes patient information on behalf of a clinic or healthcare organisation, the relevant healthcare provider is responsible for establishing the lawful basis and, where appropriate, the special-category condition for that processing.

Where EPR Connect acts as a controller in its own right, it may rely on:

- Contract - where processing is necessary to provide services requested by a customer or user.
- Legal obligation - where processing is required to comply with legislation or regulatory requirements.
- Legitimate interests - where necessary for appropriate business administration, platform security, fraud prevention, service improvement and protection of legal rights, provided those interests do not override individuals' rights.
- Consent - where appropriate, including certain optional marketing communications. Consent may be withdrawn at any time.

EPR Connect does not rely on consent where another lawful basis is more appropriate for the provision of healthcare-related services.

6. Who information may be shared with

Information may be shared where necessary with:

- the healthcare organisation responsible for a patient's care
- authorised healthcare professionals

- authorised administrative staff
- carefully selected technology and hosting providers
- communications providers
- identity or authentication providers
- professional advisers
- regulators
- law-enforcement bodies where legally required
- other organisations where disclosure is required by law

Access to clinical information is restricted according to users' roles and permissions. EPR Connect does not sell patient information.

7. Data processors and sub-processors

EPR Connect may use specialist technology suppliers to support the operation of its platform. Where another organisation processes personal information on our behalf, appropriate contractual and data-protection arrangements will be put in place. Where EPR Connect is itself acting as a processor, the use of sub-processors will be governed by our agreement with the relevant healthcare organisation.

8. Security

EPR Connect takes appropriate technical and organisational measures to protect personal information against unauthorised access, loss, alteration, disclosure, destruction and unlawful processing. Measures may include:

- role-based access controls
- individual user authentication
- encryption
- system audit trails
- access logging
- secure backups
- vulnerability management
- incident-management procedures
- access restrictions based on organisational and professional requirements

No internet-based system can be guaranteed to be completely secure. EPR Connect continually reviews controls according to the risks presented by the information being processed.

9. International transfers

Where possible, EPR Connect seeks to process and store healthcare information within the United Kingdom or other approved locations. If personal information is transferred outside the UK, appropriate safeguards required by UK data-protection legislation will be implemented.

10. How long information is retained

Patient clinical information will normally be retained in accordance with the instructions and retention requirements of the healthcare organisation responsible for the patient record. Other information is retained only for as long as reasonably necessary for the purpose for which it was collected, including legal, security, contractual and regulatory purposes.

11. Your data protection rights

Depending on the circumstances, individuals may have rights including access to their personal information, correction of inaccurate information, erasure, restriction of processing, objection to processing, data portability, and rights relating to certain automated decision-making. These rights are not absolute and may depend on the lawful basis and purpose of processing.

Where EPR Connect processes clinical information on behalf of a healthcare provider, requests concerning a patient's medical record should normally be directed to the relevant healthcare provider. EPR Connect will assist its healthcare customers with appropriate requests where required.

12. Automated processing and artificial intelligence

Certain EPR Connect functions may use automated technologies or artificial intelligence to assist healthcare professionals with administrative or documentation tasks. Unless explicitly stated otherwise, such functionality is intended to support rather than replace professional clinical judgement.

Healthcare professionals remain responsible for reviewing and validating clinical information before relying on it or adding it to the patient's formal record. EPR Connect will not make solely automated decisions producing legal or similarly significant effects on an individual unless a lawful and appropriately safeguarded process has been established.

13. Data breaches

EPR Connect maintains procedures for identifying, assessing, managing and reporting personal-data breaches. Where EPR Connect acts as a processor, it will notify the relevant controller without undue delay where required.

14. Complaints

If you have concerns about how information is being processed, contact info@eprconnect.co.uk. You also have the right to raise concerns with the Information Commissioner's Office (ICO).

15. Changes to this notice

EPR Connect may update this Privacy Notice to reflect changes to legislation, regulatory guidance, technology or the services provided.

2. Cookie Policy

Last updated: 7 September 2026

EPR Connect uses cookies and similar technologies to operate and protect its website and platform. A cookie is a small piece of information stored on a user's device when visiting a website.

Types of cookies

Strictly necessary cookies

These are required for essential platform functions including account authentication, security, session management, user preferences, fraud prevention and maintaining the operation of the service. These cookies do not require consent where they are genuinely necessary for provision of the service requested by the user.

Analytics cookies

Analytics technologies may be used to understand how people interact with the website and to improve its operation. Where consent is legally required, these technologies will not be activated until the user has provided permission.

Functional cookies

These may remember settings or preferences that improve the user's experience.

Marketing cookies

EPR Connect will not place advertising or marketing cookies on a user's device without the necessary consent.

Managing cookies

Users can accept, reject or manage non-essential cookies through the website's cookie-management controls and may change their preferences at any time. Blocking certain strictly necessary cookies through browser settings may affect the operation of the platform.

Cookie register

The live Cookie Policy and cookie banner should identify the actual cookies and technologies deployed on EPR Connect. The register should be updated whenever analytics, advertising, support widgets or other third-party technologies are added or removed.

3. Data Protection & Information Security Statement

Our commitment to protecting healthcare information

EPR Connect recognises that healthcare information is highly sensitive. The platform is intended to be designed and operated using principles of confidentiality, integrity, availability, accountability and data protection by design and by default.

Our approach includes:

- limiting access according to professional role and operational need
- separating access between organisations and clinics where appropriate
- maintaining individual user accounts
- maintaining audit logs
- protecting information during transmission and storage
- applying secure authentication controls
- monitoring inappropriate or unauthorised access
- maintaining backup and recovery arrangements
- managing security incidents
- reviewing third-party suppliers
- maintaining appropriate contractual controls
- minimising the information collected and processed
- retaining information only where necessary
- regularly reviewing security arrangements as the service develops

Users must never share login credentials or attempt to access patient information that they are not authorised to view.

> Suspected security incidents should be reported immediately to info@eprconnect.co.uk.

4. Clinical Safety & AI Disclaimer

Clinical responsibility

EPR Connect is a digital healthcare software platform. Unless expressly stated otherwise, EPR Connect does not provide medical diagnosis, medical treatment or emergency medical services. Clinical decisions remain the responsibility of appropriately qualified healthcare professionals.

Artificial intelligence

Where EPR Connect provides AI-assisted functionality, including drafting clinical correspondence, summarising information or assisting with documentation:

- AI-generated content must be reviewed by an appropriately authorised user
- AI-generated information should not automatically become part of a patient's final clinical record without appropriate review
- clinicians must verify clinical accuracy
- clinicians remain responsible for clinical decisions
- AI functionality should not be treated as a substitute for professional judgement
- suspected inaccuracies should be corrected before information is relied upon

Emergencies

EPR Connect must not be used as an emergency medical service. Individuals experiencing a medical emergency should use the appropriate emergency healthcare service.

> **Safety principle:** AI-assisted outputs are support tools. Final clinical records, communications and clinical decisions require appropriate human review.

5. Acceptable Use Policy

Users of EPR Connect must use the platform lawfully, securely and only within the scope of their authorised role.

Users must

- access only records they are authorised to access
- keep account credentials confidential
- use the platform only for lawful and legitimate purposes
- ensure information entered into clinical records is appropriate and accurate
- comply with their professional and organisational obligations
- promptly report suspected security incidents
- not attempt to bypass security or permission controls
- not access another clinician's or organisation's patient information without appropriate authority
- not introduce malicious software
- not attempt to reverse engineer, interfere with or compromise the platform
- ensure use of EPR Connect complies with applicable healthcare and data-protection requirements

Enforcement

EPR Connect may suspend or restrict access where reasonably necessary to protect patients, users, information security or the integrity of the service. Serious or repeated misuse may also be referred to the relevant employing organisation, regulator or law-enforcement body where appropriate and lawful.

Related governance documents

In addition to these public-facing policies, EPR Connect should maintain appropriate contractual and internal governance documentation, including a Data Processing Agreement for clinic customers, a Data Protection Impact Assessment where required, a data-retention schedule, incident-response procedure, sub-processor register, access-control procedure and records of processing activities.

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