



## **INTRODUCTION**

The Western Regional Health Authority (“WRHA”) uses this notice to disclose the privacy practices of the organization in accordance with privacy regulations, particularly, the Jamaica Data Protection Act, 2020 (JDPA) and the General Data Protection Regulation (GDPR). We aim to help you understand what personal and sensitive personal data we collect, how we use it, and what control you have over it. This notice applies solely to data collected by the WRHA. This notice will define the following:

1. What personal data and sensitive personal data is collected from your interactions with our website and our representatives.
2. How personal and sensitive personal data is collected, used, shared, stored, and otherwise processed.
3. The general security procedures implemented to protect your data.
4. Your choices and rights regarding the use of your data.
5. How you can contact us for matters relating to data such as correcting inaccuracies of your data.

Please read the following privacy notice to understand the processing, collection, sharing, protection, and your rights associated with your personal data.

### **OUR COMMITMENT TO DATA PROTECTION**

The WRHA respects our patients, employees and all stakeholders’ fundamental right to privacy and we are unwavering in our commitment to safeguarding personal, sensitive and health data and ensuring the required standards of protection. We recognize the importance of maintaining the integrity, confidentiality and security of the information entrusted to us. Our data protection practices are guided by stringent policies, security measures and compliance with the Jamaica Data Protection Act. By fostering a culture of accountability, we strive to protect against data breaches and mishandling of personal and sensitive personal information.

The WRHA values data privacy and will handle your personal and sensitive information with professionalism, respect and in compliance with relevant laws.

### **TYPES OF INFORMATION WE COLLECT**

We have access to any data that you voluntarily provide via email, telephone, forms, chat functions, newsletter sign-up, contests, surveys, patients registration/bookings, event planning/execution, patient services requests, applications, recordings and other interactions while visiting with us at one of our locations or otherwise communicating with us electronically.



Through these means, we may collect the following types of data:

- Demographics data
- Medical/ Health data
- Full name
- Email address
- Phone number
- Address
- Details on services received from us
- Location
- Photos and Videos
- Marital Status
- Occupation
- Date of birth
- Gender
- Nationality
- ID Numbers such as Driver's License number and/or Passport number
- Medical information, as a requirement for medical treatment and diagnosis,
- Information about any complaints, enquiries, and communication you make with us.

### **HOW WE USE YOUR DATA**

Your personal information may be used for the following purposes, which are not exhaustive:

1. to deliver direct patient care, such as diagnosing conditions, developing treatment plans, and managing ongoing care.
2. to track patient history, treatments, test results, and prescribed medications.
3. to ensure patients receive specialized services like home care, rehabilitation, and mental health support tailored to their needs.
4. to coordinate and manage appointments, referrals, and consultations between different healthcare providers.
5. to process payments, insurance claims, and handling government-funded healthcare programs.
6. to manage hospital bed availability, equipment needs, and staffing to ensure the efficient operation of facilities.
7. to monitor, track, and respond to public health issues, such as outbreaks of communicable diseases like COVID-19.
8. to identify target populations for preventative health programs, vaccination campaigns, and community health initiatives.
9. Aggregated data from patients is used to assess overall community health trends, identify risk factors, and inform policy decisions.
10. Personal health data, often anonymized, is used for clinical research to develop new treatments, improve care delivery, and contribute to medical knowledge.
11. to evaluate candidates and ensure they meet the requirements for positions.
12. to process payroll, manage benefits (e.g., health insurance, pensions), and administer other compensation-related matters.
13. to ensure accurate payroll processing, and to manage employee time-off entitlements.



14. to ensure that the WRHA complies with labor laws, workplace safety regulations, and healthcare standards. This can include health and safety certifications, professional licensing, and adherence to training requirements.
15. to ensure compliance with occupational health and safety regulations and to manage workers' compensation claims.
16. to assess performance, identify areas for improvement, and support promotions or transfers.
17. to track employee training history, certifications, and ongoing professional development to ensure employees meet mandatory qualifications and continue growing professionally.
18. to assign the right personnel to appropriate departments or patient care areas, especially in specialized fields such as intensive care or emergency services.
19. to understand employee satisfaction, workplace culture, and areas for improvement within the organization.
20. to manage access to WRHA systems, including electronic and physical health records, internal databases, and communication platforms. This ensures that employees have appropriate access based on their roles and responsibilities.
21. to meet legal requirements for health reporting, such as mandatory reporting of certain diseases or healthcare outcomes.
22. to provide urgent care, ensure quick access to patient history, and coordinate between emergency services and hospitals.
23. In situations such as natural disasters or large-scale public health emergencies, data helps WRHA plan and deliver emergency services.

## **LEGAL BASIS FOR PROCESSING YOUR DATA**

### **1. Consent**

The WRHA often relies on patient consent to collect, use, and share personal and or sensitive personal health information for the provision of healthcare services. Patients are typically informed of how their data will be used and must give consent, except in certain emergency or legally mandated situations.

Employees may provide consent for specific uses of their personal and or sensitive personal data, such as for participation in wellness programs, training, or optional services. However, consent is not always required for standard employment data processing.

### **2. Contractual**

Personal and/or sensitive personal data of employees is processed as part of fulfilling employment contracts. This includes processing payroll, benefits, performance management, and other employment-related obligations.



Data processing may be necessary for fulfilling agreements between the WRHA and third-party providers (e.g., subcontractors, vendors) involved in the supply of goods, delivery of healthcare or operational services.

### **3. Legal Obligation**

- WRHA is subject to numerous laws that require the processing of personal data and sensitive personal data.
- Legal obligations may require WRHA to process and report personal data to public health authorities, such as for notifiable diseases, immunization records, or in the event of public health emergencies (e.g., pandemics).

### **4. Vital Interests**

- Personal data may be processed without consent in situations where it is necessary to protect an individual's vital interests, such as during medical emergencies where obtaining consent is not possible. This could involve accessing patient records for life-saving treatment or contact tracing during infectious disease outbreaks.

### **5. Public Interest and Public Health**

- Data is processed in the public interest for tasks such as disease prevention, health promotion, and ensuring the broader public's safety. This includes processing data related to vaccination campaigns, public health monitoring, and responses to health crises.
- The WRHA processes data for the administration of the health system, including resource allocation, patient flow management, and service planning to benefit the public.

### **6. Legitimate Interests**

- The WRHA may process data under legitimate interests, such as ensuring the efficient operation of healthcare facilities, improving service delivery, or enhancing patient care through quality improvement initiatives.

## **HOW WE SHARE YOUR DATA**

Personal and sensitive personal information may be shared with regulators in Jamaica in compliance with legal regulations and instructions. We do not sell your personal information to anyone.

### **a. Within the WRHA**

Your personal and sensitive personal information may be shared with various departments within the WRHA for processing purposes.

### **b. Public Authorities and Regulatory Bodies**

The WRHA may share your information where it is necessary for us to comply with legal and regulatory obligations.



#### **c. Law Enforcement Bodies**

We may share your information where necessary to facilitate the prevention or detection of a crime or the apprehension or prosecution of offenders.

#### **d. Third party Vendors**

Personal and sensitive personal data may also be shared with third parties when it is necessary to provide services to patients and staff, and/or for other legitimate interests. Third parties include service and healthcare providers, professional advisors, and other members of the Western Regional Health Authority network.

#### **e. International Transfers**

We only transfer personal data to countries that provide an adequate level of data protection or where appropriate safeguards, such as standard contractual clauses or binding corporate rules, are in place to protect the privacy and security of personal information.

Prior to any international data transfers, we obtain explicit consent from individuals unless an exception under the applicable privacy laws applies. Additionally, we assess the legal requirements and risks associated with the transfer to ensure the continued protection of personal data, as outlined by relevant privacy legislation.

### **HOW LONG WE STORE YOUR DATA**

We retain appropriate records of your personal and sensitive personal information to provide healthcare services, in the usual course of employer and employee relations, to satisfy contractual terms and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the services to you or past contract expirations. Retention periods are determined based on the type of record, the nature of the activity, product or service and the applicable local legal or regulatory requirements. In most cases we will retain your personal information for no longer than is required under the applicable laws and in accordance with the WRHA Data Retention and Data Disposal Policy.

Your data may also be kept for longer periods if we cannot delete it for legal, medical, regulatory, or technical reasons, or as necessary to resolve disputes, and enforce our agreement.

### **HOW WE PROTECT YOUR DATA**

Securing your data is a priority for us, both digital and paper based. We have implemented appropriate safeguards to prevent, as best as possible, personal



or sensitive personal data from being lost, misused, accessed, altered, or disclosed by unauthorized parties.

**Encryption:** All electronic personal and sensitive personal data in transit is encrypted (using SSL/TLS)

**Access Control:** Role-based access controls (RBAC) ensure that only authorized personnel can access specific data based on job roles and responsibilities.

**Data Anonymization and Pseudonymization:** Personal data is anonymized or pseudonymized wherever possible to minimize the risk of identification in case of a breach.

**Firewalls and Intrusion Detection Systems:** Network firewalls and intrusion detection/prevention systems (IDS/IPS) are implemented to monitor and block unauthorized access attempts.

**Secure Physical Storage:** Physical records are stored in locked, access-controlled environments, such as secured cabinets or rooms, with limited personnel access.

**Data Minimization:** Personal data collected and stored is limited to what is necessary for specific purposes, reducing the potential impact of a data breach.

**Data Backup and Recovery:** Regular backups of all electronic critical data are maintained securely, with disaster recovery plans in place to ensure data availability and integrity in case of loss or damage.

**Employee Training:** Staff receive ongoing training on data protection, security protocols, and best practices, ensuring compliance with relevant laws and regulations.

## USE OF COOKIES

Cookies are used on <https://www.wrha.gov.jm/> for various purposes. These “cookies” are data elements stored on your hard drive that allow us to improve your usage of our website. By using a cookie to identify you, some features of our website may be able to continue from a previous session, saving you time when accessing our site. In addition, we use cookies for advertising products based on your usage history, storing and managing your preferences on the website, enabling content, and generally analyzing your usage of our website.



Usage of cookies may be linked to your personal data on the website. For more information, see our Cookie policy.

## **YOUR RIGHTS REGARDING YOUR PERSONAL DATA AND SENSITIVE PERSONAL DATA**

We aim to maintain data that is accurate and up to date, while also ensuring that only the minimum data required to facilitate your stay with us is captured and used.

In certain instances, you have the legal right to the following:

YOUR RIGHTS	WHAT IT MEANS
The right to access your personal data	You have the right to be informed whether, and to what extent, we process your data. Subject to certain exceptions, you have the right to obtain a confirmation as to whether we process your personal data, and if we do, request access to your data.
The right to consent to processing	You have the right to consent to the processing of your personal information. If your personal data is processed based on your consent, you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.
The right to prevent processing	You have the right to object to the processing of your personal information in certain situations.
Rights in relation to automated decision making	You have the right to object to decisions based exclusively on the automated processing of your personal information.
The right to rectification	If the personal information that we process is incomplete or incorrect, you have the right to request their completion or correction at any time.

### **HOW TO EXERCISE YOUR RIGHTS**

To exercise your rights or to express any concern about your data that we have collected, please contact us via the email, mail, or phone information provided below in the “Contact Information” section.





## LINKS TO THIRD PARTY WEBSITES

On our website, you may encounter links to other websites. Be aware that we are not responsible for the content, privacy practices of these entities or their websites including for their compliance or breach of data protection laws.

The WRHA strongly encourages all users to review the privacy notices/policies of any other sites that may collect your personal data. We have no control over and do not assume responsibility for any third-party websites or services and by accessing third party websites and services, including from our website, you agree to hold WRHA harmless and absolve it of any liability or responsibility.

## CONTACT INFORMATION

For any questions, concerns, or requests to exercise your rights outlined in this privacy notice, please contact us our Data Protection Officer at:

**Email:** [dataprotection@wrha.gov.jm](mailto:dataprotection@wrha.gov.jm)  
**Telephone/ WhatsApp:** (876) 630-1860 or (876) 808-6394  
**Address:** Data Protection Officer  
Western Regional Health Authority  
Shop #10 Freeport Business Centre  
Montego Bay  
St. James  
Jamaica W.I

If you are not satisfied with the way that we have handled your concern, you have the right to raise the matter with the Office of the Information Commissioner using the contact details below:

**Email:** [info@oic.gov.jm](mailto:info@oic.gov.jm)  
**Telephone:** (876) 920-4390  
**Address:** Office of the Information Commissioner  
The Masonic Building (2nd Floor)  
45-47 Barbados Avenue  
Kingston 5, Saint Andrew  
Jamaica W.I

## CHANGES TO THIS PRIVACY NOTICE

WRHA reserves the right to reasonably amend this Privacy Notice from time to time to ensure that it accurately reflects the way we collect and use personal and sensitive personal information about you. You are encouraged to regularly review this Notice to ensure that you understand how we collect and use your personal and sensitive personal information and to see any changes that may have occur.