PRIORY MEDICAL CENTRE

Privacy Notice - Grow Your List Size

Owner – Executive Director

Version:	Review date:	Edited by:	Approved by:	Comments:
1	02/11/2026	Robert Massey-Ellis	Robert Massey-Ellis	
2				
3				
4				
5				

Privacy Notice - Grow Your List Size

Table of Contents

How we use your information with Grow Your List Size 3
Why do we use Grow Your List Size? 3
What information may be accessed? 3
How is my information accessed? 4
Is my information given to Grow Your List Size? 4
What is our lawful basis for using your information? 4
Will Grow Your List Size send me messages? 4
Patient surveys and feedback 5
How long is information kept? 5
Is my information transferred outside the UK? 5
Is automated decision-making used? 5
How do we protect your information? 5
Your data protection rights 6
Can I object to how my information is used? 6
Who can I contact? 6
About this privacy notice 7

How we use your information with Grow Your List Size

Priory Medical Centre is committed to protecting your privacy and being open and transparent about how your personal information is used.

We work with **Grow Your List Size Ltd (GYLS)** to support the Practice with patient registration processes, appropriate non-clinical patient communications, patient feedback and service improvement.

For the purposes of UK data protection legislation, **Priory Medical Centre remains the Data Controller** for your personal information. Grow Your List Size Ltd acts as a **Data Processor**, which means that it may only process information on our documented instructions and for the purposes we have authorised.

Why do we use Grow Your List Size?

We use Grow Your List Size to help us:

- improve and support our patient registration processes;
- support the appropriate growth and maintenance of our registered patient list;
- send Practice-approved, non-clinical communications to patients;
- invite patients to provide anonymous feedback about our services;
- support the Practice in reviewing publicly available Google feedback; and
- produce anonymous or aggregated information to help us understand how the service is performing and identify opportunities for improvement.

The Practice retains control over the purposes for which information is used, patient selection, the content of patient communications and access to our systems.

What information may be accessed?

Where necessary to carry out these activities, authorised Grow Your List Size staff may have limited access to information held by Priory Medical Centre, including:

- your name;
- date of birth;
- contact details, such as your telephone number or email address;
- information relating to your registration with the Practice;
- relevant interaction or communication information;
- limited information relating to service use; and
- information such as ethnic origin where this forms part of registration information.

Grow Your List Size is **not authorised to access or process your clinical notes** as part of this service. It does not provide diagnosis, clinical triage, make clinical decisions or provide direct clinical care.

How is my information accessed?

Where access is required, authorised Grow Your List Size staff may securely access Priory Medical Centre's **EMIS Web and Accurx systems** remotely.

Access is provided through named accounts, NHS Smartcards where applicable, role-based access controls and secure remote-access arrangements. Access is restricted according to the role of the individual and the principle that they should only have access to the information needed to perform their authorised duties.

Activity undertaken within EMIS Web can also be audited by the Practice.

Is my information given to Grow Your List Size?

Grow Your List Size may access personal information within our systems where this is necessary to provide the service, but there are strict restrictions on what it can do with that information.

Under our arrangements, Grow Your List Size must **not download, export, photograph, screenshot or otherwise make or retain local copies of identifiable patient information** unless expressly authorised and necessary for an approved purpose.

Identifiable patient information therefore remains within Priory Medical Centre's approved NHS clinical systems.

Grow Your List Size must not sell your information, use it for advertising, undertake data-brokerage activities or use it for its own independent purposes.

What is our lawful basis for using your information?

Under the **UK General Data Protection Regulation (UK GDPR)**, Priory Medical Centre relies upon:

- **Article 6(1)(e) - Public Task**, for the processing of personal information; and
- **Article 9(2)(h) - Health or Social Care**, where the processing involves special category health information.

The relevant condition under the **Data Protection Act 2018** is Schedule 1, relating to health and social care purposes.

The Practice's approved Data Protection Impact Assessment also considered the Common Law Duty of Confidentiality. The arrangement operates on the basis of implied consent within patients' ongoing relationship with the Practice for the relevant health and care purposes.

You do not need to give separate data protection consent for us to process your information where these legal bases apply.

Will Grow Your List Size send me messages?

Grow Your List Size may send certain **Priory Medical Centre-approved, non-clinical communications** to patients on behalf of the Practice using Accurx.

Priory Medical Centre approves the relevant patient group and message content. Communications are sent under the Practice's instruction and appropriate controls are used to reduce the risk of sensitive information being disclosed inadvertently.

Where a communication would constitute direct marketing rather than a health or service-related communication, it would be subject to separate requirements under the **Privacy and Electronic Communications Regulations (PECR)** and appropriate consent or preference controls would be applied.

Patient surveys and feedback

We may invite patients to give feedback about our services. Survey responses used through this service are intended to be **anonymous**, and the Practice receives anonymous or aggregated information for service improvement purposes.

Grow Your List Size may also support Priory Medical Centre in reviewing feedback that patients have chosen to post publicly, such as Google reviews. Public reviews should not be linked to an individual's clinical record through this service.

How long is information kept?

Identifiable patient information accessed as part of this service remains within Priory Medical Centre's systems and is retained in accordance with the Practice's NHS records-management requirements. Grow Your List Size is not permitted to retain its own copies of identifiable patient information.

Under the agreed arrangements:

- access logs are normally retained for **12 months**;
- anonymous survey information may be retained for up to **24 months**; and
- aggregated performance reports may be retained for **12 to 24 months**, subject to review of whether they continue to be required.

Supplier access is revoked when it is no longer required. [

Is my information transferred outside the UK?

No international transfer of identifiable patient information is permitted as part of the approved service arrangements.

Any future change involving international access, a new sub-processor or a significant change in how patient information is used would require review and approval by Priory Medical Centre, including a review of the Data Protection Impact Assessment where appropriate.

Is automated decision-making used?

No automated decision-making is undertaken as part of this service.

Grow Your List Size is not authorised to undertake automated profiling, scoring or automated eligibility decisions about patients under the current arrangement. Any proposal to introduce such processing would require further assessment before it could be implemented.

How do we protect your information?

Priory Medical Centre and Grow Your List Size have measures in place to protect patient information. These include:

- named and role-based user accounts;
- NHS Smartcard access where applicable;
- least-privilege access controls;
- multi-factor authentication and secure remote access;
- restrictions on downloading or copying patient information;
- audit logging;
- confidentiality requirements;
- information governance and data protection training; and
- processes for promptly removing access when it is no longer required.

Grow Your List Size is also subject to contractual data protection and confidentiality obligations when processing information on behalf of Priory Medical Centre.

Your data protection rights

You continue to have rights over your personal information when it is processed as part of this service.

Depending on the circumstances, these may include the right to:

- ask for access to the personal information we hold about you;
- ask us to correct inaccurate information;
- ask us to restrict the use of your information;
- object to certain uses of your information; and
- ask for information to be erased where the legal requirements for erasure are met.

Priory Medical Centre remains responsible for dealing with requests relating to your information. If Grow Your List Size receives a request relating to your data, it is required to pass this to the Practice.

Can I object to how my information is used?

If you have concerns about your information being used as part of this service, or do not wish to receive particular non-essential communications, please contact Priory Medical Centre.

We will consider your request in accordance with data protection legislation and your individual circumstances. Where appropriate, communication preferences or suppression arrangements can be applied.

Choosing not to participate in optional surveys or feedback activities will not affect the healthcare you receive from Priory Medical Centre.

Who can I contact?

If you have any questions or concerns about how Priory Medical Centre uses your personal information, or you would like to exercise one of your data protection rights, please contact:

Priory Medical Centre
Data Protection / Information Governance Team

Please use the contact details published on the Practice website.

You can also raise a concern with the **Information Commissioner's Office (ICO)** if you are unhappy with how your personal information has been handled.

About this privacy notice

Priory Medical Centre completed a **Data Protection Impact Assessment (DPIA)** before implementing this service. The assessment considered the purposes of processing, legal basis, confidentiality, information security, patient rights and potential risks to patients. The DPIA was approved by the Practice's Data Protection Officer on **26 October 2026**.

The arrangement and DPIA will be reviewed at least annually and before any material change to the service, including changes to the information accessed, systems used, patient groups, purposes, automation, sub-processors or international access.