PRIORY MEDICAL CENTRE

Privacy Notice - Heidi Health

Owner – Executive Director

Version:	Review date:	Edited by:	Approved by:	Comments:
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Privacy Notice - Use of Heidi Health Artificial Intelligence in Consultations

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How we use Heidi Health to support your care

At **Priory Medical Centre**, we are committed to providing safe, effective care while protecting your privacy and personal information.

Some of our clinicians use **Heidi Health**, an artificial intelligence (AI) assisted clinical documentation system, during patient consultations. Heidi helps clinicians by transcribing the conversation and preparing a draft clinical note or other clinical documentation. This can reduce the amount of time clinicians need to spend typing or taking notes during your appointment.

Heidi does not replace your clinician. Your clinician remains responsible for your care and for the accuracy of anything entered into your medical record. AI-generated documentation is reviewed by a clinician before it is added to your record. The system is not used by the Practice to make automated decisions about your care.

What happens during your consultation?

If your clinician wishes to use Heidi:

1. You will be told that Heidi is being used.
2. Your clinician will ask for your agreement before using it.
3. Heidi processes the conversation to produce a written transcript.
4. AI technology uses the transcript and relevant information provided by your clinician to produce a draft clinical note or other clinical documentation.
5. Your clinician reviews the information for accuracy and makes any necessary changes.
6. The appropriate clinical information is then transferred to your medical record.

You can ask questions about Heidi before agreeing to its use.

You do not have to agree to Heidi being used.

You can decline before the consultation starts, or ask the clinician to stop using it during the consultation. **Choosing not to use Heidi will not affect the care you receive from Priory Medical Centre.**

Is my consultation being recorded?

Heidi needs to process the audio from your consultation in order to convert speech into text.

For clinical consultations, **audio is processed in real time and immediately discarded rather than being retained as an audio recording of your consultation**. Temporary handling may differ when approved mobile or desktop applications are used, where audio can be held securely while it is being processed and is automatically deleted after successful processing.

So, although Heidi needs to listen to the consultation to prepare the transcription, Priory Medical Centre is not using it to create a permanent audio recording of your appointment.

What information could be processed?

Because a clinical conversation can cover many aspects of a person's health and circumstances, information processed by Heidi could include:

- your name and other identifying information;
- your NHS number;
- your date of birth and age;
- your address or telephone number;
- details about your physical and mental health;
- symptoms, diagnoses, examination findings and treatment;
- medications and referrals;
- information about sexual health or sexual orientation;
- racial or ethnic information;
- religious or philosophical beliefs;
- information about other people mentioned during the consultation, such as a family member or carer; and
- any other information relevant to your care that is discussed during the consultation.

Heidi uses processes designed to **de-identify and pseudonymise information** before transcripts are processed into clinical notes and documents. Nevertheless, healthcare conversations can contain information capable of identifying an individual, which is why we treat the information as confidential patient information and apply appropriate safeguards.

Why do we use Heidi?

We use Heidi to assist clinicians with clinical documentation.

This can help:

- give clinicians more time to concentrate on you rather than typing notes;
- support more natural conversations and eye contact during appointments;
- produce more comprehensive notes of consultations;
- reduce the risk of important information being missed when notes are written after an appointment;
- support preparation of referrals and other clinical documentation; and
- reduce the administrative burden on clinicians.

The approved data protection assessment also recognises that Heidi can suggest SNOMED codes and support the creation of clinical documentation, although the clinician remains responsible for reviewing information before it forms part of the patient's record.

Who is responsible for my information?

For the use described in this notice, **Priory Medical Centre is the Data Controller**. This means that we determine why and how your personal information is processed.

Heidi Health Ltd acts as a Data Processor, processing information on our behalf in accordance with contractual and data protection requirements. Heidi also uses carefully selected sub-processors where these are necessary to provide its service.

What is our legal basis for using your information?

Your agreement to Heidi being used during your consultation is important because your confidential information is being processed as part of the consultation. Your clinician will therefore obtain your agreement before using Heidi.

For data protection purposes, however, **consent is not the UK GDPR lawful basis on which Priory Medical Centre relies to provide your healthcare and maintain your clinical record.**

Our principal lawful bases are:

- **UK GDPR Article 6(1)(e)**: processing is necessary for the performance of our public task in providing NHS primary medical services and maintaining appropriate clinical records.
- **UK GDPR Article 9(2)(h)**: processing of health and other special category information is necessary for the provision and management of health or social care.

The relevant provisions of the **Data Protection Act 2018** also apply.

Your agreement to Heidi being used helps us meet our confidentiality obligations. You can refuse Heidi without affecting your treatment.

Where is the information processed?

The approved Data Protection Impact Assessment states that data for UK customers is hosted within the **UK** and that Heidi uses secure cloud infrastructure and sub-processors to deliver its service. The DPIA identifies sub-processor infrastructure in locations including London, Dublin and Frankfurt while stating that processing activities for UK customers are conducted within the UK.

Information is protected through security measures including encryption during transmission and encryption at rest, together with access controls designed around the principle of least privilege.

How long does Heidi keep my information?

Priory Medical Centre aims to minimise the time information remains within Heidi.

Clinical consultation audio is processed in real time and is not retained as a permanent recording. Transcripts, generated clinical notes and other clinical documents may be retained temporarily within Heidi according to the retention arrangements configured by the Practice. The approved DPIA states that these may be stored for **no longer than 28 days**, with automatic deletion according to the retention period selected by the Data Controller.

Once the appropriate information has been transferred to your GP medical record, that information forms part of your clinical record and is retained in accordance with the NHS requirements applying to GP medical records.

Does Heidi make decisions about my healthcare?

No.

Heidi assists with transcription and the preparation of documentation. It does not replace the clinical judgement of your doctor, nurse or other healthcare professional.

The approved DPIA confirms that there is **no automated decision-making** for this processing. Information generated using Heidi is checked by a healthcare professional before being entered into the patient's medical record.

How do we keep your information safe?

Priory Medical Centre and Heidi Health apply safeguards to protect the confidentiality and security of information.

The safeguards documented in our assessment include:

- encryption of information in transit;
- AES-256 encryption for data at rest;
- role-based access controls;
- multi-factor authentication where applicable;
- controls limiting access according to the principle of least privilege;
- de-identification and pseudonymisation processes;
- agreements governing processing by third-party sub-processors;
- information governance and security training; and
- security monitoring and auditing arrangements.

Our DPIA also records that Heidi Health had a **Data Security and Protection Toolkit Standards Met submission dated 25 June 2026**, and records Cyber Essentials and Cyber Essentials Plus certification dated 2 July 2026.

What happens if I mention someone else?

Sometimes you may need to talk about a partner, relative, carer or another person during your consultation.

If information about another person is relevant to the discussion, it may therefore be included in the information temporarily processed by Heidi. This is one reason that we apply the same confidentiality and data-security protections to the consultation as we do to other clinical information.

Can I say no?

Yes.

Using Heidi is optional from the patient's perspective.

You can:

- tell your clinician that you do not want Heidi used;
- decline when your clinician asks you before starting;
- ask for Heidi to be stopped during the consultation; or
- ask questions about how it works.

Your decision will not affect your access to NHS care or the treatment you receive from Priory Medical Centre.

Your data protection rights

Data protection law provides you with a number of rights concerning your personal information. Depending on the circumstances, these can include the right to:

- be informed about how we use your information;
- request access to information we hold about you;
- ask us to correct information which is inaccurate;
- request restriction of certain processing;
- object to certain uses of your information; and
- raise concerns about how your information has been handled.

Not every data protection right applies in every situation, particularly where information forms part of your NHS medical record and there are legal or clinical reasons for retaining it.

If you believe information in your GP record is inaccurate, please contact Priory Medical Centre so that this can be considered under our normal medical-record rectification procedures.

Further information or concerns

If you would like more information about how Priory Medical Centre handles your personal information, please see our main **Practice Privacy Notice** or contact the Practice.

If you have questions specifically about Heidi being used during an appointment, please speak to your clinician. They can explain how the system is being used before you decide whether you are happy for them to proceed.

You also have the right to raise concerns about the handling of your personal information with the **Information Commissioner's Office (ICO)**.

Our commitment to you

Heidi is a tool to support your clinician, not to replace them.

We use this technology to help clinicians spend more of the consultation focusing on patients while maintaining an accurate clinical record. Your clinician remains responsible for reviewing the information that is entered into your medical record, and you can choose not to have Heidi used during your consultation without this affecting your care.