

1. What is the purpose of this document?

The University of Oxford is committed to protecting the privacy and security of your personal information ('personal data').

This privacy policy describes how we collect and use your personal data during your participation in the SUpport through Mobile Messaging and digital health Technology for Diabetes (SuMMiT-D) Study in accordance with the UK Data Protection Act [DPA] 2018, which implements the EU General Data Protection Regulation (GDPR) in the UK.

It is important that you read this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using your information. We may update this policy at any time.

2. Glossary

Where we refer in this policy to your 'personal data', we mean any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed (anonymous data).

Where we refer to the 'processing' of your personal data, we mean anything that we do with that information, including collection, use, storage, disclosure or retention.

3. Who is using your personal data?

The University of Oxford (The University's legal title is the Chancellor, Masters and Scholars of the University of Oxford) is the "data controller" for the information that we obtain from you or others as part of the SuMMiT-D Study. This means that we decide how to use it and are responsible for looking after it in accordance with the UK Data Protection Act (UKDPA) 2018 and the General Data Protection Regulation Act (GDPR).

Access to your data will be provided to designated members of our staff who need to view it as part of their work in carrying out the purposes set out in section 5. We also share data with the third parties described in section 6.

4. The types of data we hold about you and how we obtained it

We collect the majority of the information directly from you, when you complete our questionnaires. This information includes the personal details provided by you on study questionnaires at recruitment between 2021 and 2022. This information includes name, address and date of birth, and special categories of more sensitive personal data, including health-related data. These data include information on factors such as height, weight, smoking, ethnic group, personal medical history.

When you joined the study you also gave us consent to use information from your NHS medical records as part of our follow-up. We receive some of this information directly from your medical records held by your GP. We also asked for consent to collect data from registries held by NHS England. Where you gave consent for this we receive information from health registries and NHS bodies in England, which hold national health and social care records. We provide your details (name, date of birth, NHS number, and postcode) to health registries in order to receive information about SuMMiT-D Study participants in return. This currently includes information on, hospital admissions, GP consultations and prescriptions.

This information is requested from NHS England for participants.

5. How the university uses your data

When you agree to take part in a research study, we use your data (including your health data) in the ways needed to conduct and analyse the research study. Health and care research should serve the public interest, which means that we have to demonstrate that our research serves the interests of society as a whole. To ensure we carry out the research to the highest standards we comply with the UK Policy Framework for Health and Social Care Research.

We combine the information you have given us on our questionnaires with the information we have collected from NHS records, this will be used to determine if the use of text messaging to support people with Type 2 diabetes is effective in a primary care setting. Use of accurate data from medical records in combination with information provided in questionnaires will allow us to determine the effect of the study both on specific measures such as HbA1c and on quality of life.

We collect and process your data (including your special category sensitive data) in this way for the purpose of performing scientific (medical) research being carried out in the public interest. This is known under data protection law as our “legal basis” for processing personal data. We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. We do not use your personal data for any form of automated decision-making or public profiling.

Please note that we may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

The University of Oxford Policy on Data Protection can be accessed via the [University website](#).

6. Who has access to your data?

Access to your data within the University will be provided to those who need to view it as part of their work in carrying out the purposes described above.

In addition, in order to perform our research and other legal responsibilities or purposes, we will, from time to time, need to share your information with the following:

- external organisations providing services to us, including those who provide us with data; and
- external regulatory bodies.

All third-party service providers that process data on our behalf are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions. Where information is shared with any of the third parties listed above, we will seek to share the minimum amount necessary and to provide this information in the form of pseudonymised data (as described in Section 4) wherever possible.

In order to maximise the value of the information that you have given us for health-related research, we will also share data with researchers from our collaborating research organisations, for the purposes of health-related research.

In order to keep the identity and the privacy of our participants safe and secure, we will only share pseudonymised data with external researchers under strict legal agreement between the University of Oxford and the receiving University. Before they can access any data, all researchers will need to demonstrate that they have the necessary approvals and information security credentials to use your de-identified information for their research.

7. Retention Period

We will be using information from you and your medical records (provided by your practice) in order to undertake this study, and will use the minimum personally-identifiable information possible. We will keep identifiable information about you for six to twelve months after the study has finished. This excludes any research documents with personal information such as consent forms, which will be held securely at the University of Oxford for twenty years after the end of the study.

8. Security

Your data will be held securely in accordance with the University's policies and procedures. Further information is available on the [University's Information Security website](#).

9. Your rights

Under certain circumstances, by law you have certain rights with respect to your data. A summary of these rights is available on the [University website](#).

If you want to exercise any of the rights described or are dissatisfied with the way we have used your information, please [contact the University's Information Compliance Team](#).

The same address can be used to contact the University's Data Protection Officer. If you remain dissatisfied, you have the right to [lodge a complaint](#) with the Information Commissioner's Office.

10. Changes to this privacy policy

We reserve the right to update this privacy notice at any time, and will seek to inform you of substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

11. Contact

If you wish to raise any queries or concerns about this privacy notice please contact us by email (summit-d@phc.ox.ac.uk), or write to:

Dr Louise Jones,
SuMMiT-D Study,
Nuffield Department of Primary Health Care,
University of Oxford, Gibson Building,
Radcliffe Observatory Quarter, Oxford OX1 6GG, UK.