





| <b>Register of amendments</b>  | <b>Date</b> |
|--|-------------|
| Reference to SD Worx replaced with Automatic Data Processing Limited   | 01-09-2024  |
| <p>Following references updated: ComRes to Savanta Group Limited, Electoral Reform Services to Civica Election Services, addition of part of ClearCourse Partnership to APT Solutions Ltd as a processor.</p> <p>Removal of the reference of sharing contact details with Civica Election Services for the GPC regional elections, these are now run in house by the BMA.</p> <p>Addition of the General Practitioners Defence Fund.</p> <p>Updated GDPR to UK GDPR throughout.</p> <p>Updated some of the links to the ICO website.</p> | 26-11-2024  |
| Following the Data (Use and Access) Act 2025, update to the complaint session and Data subject rights.   | 25-07-2025  |






# Privacy notice






This privacy notice explains how Londonwide Local Medical Committees Limited (ICO registration number Z1239475) and its subsidiary company Londonwide Enterprise Ltd (ICO registration number Z1965945) process your data and for what reasons. The notice is layered, you can click on the section below that relates to you for more detail on how we use your data:







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## Constituents








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|    | <p>Constituents are all practising GPs represented by the following Local Medical Committees (LMCs): Barnet, Bexley, Brent, Bromley, Camden, City &amp; Hackney, Ealing, Hammersmith &amp; Hounslow, Enfield, Greenwich, Haringey, Harrow, Hillingdon, Islington, Kensington, Chelsea &amp; Westminster, Lambeth, Lewisham, Merton, Newham, Redbridge, Southwark, Sutton, Tower Hamlets, Waltham Forest, and Wandsworth.</p> <p>A GP is represented by the LMC, if they are registered on the National Performers List, working in the LMC area, and paying a statutory/administrative levy. Constituents also include sessional GPs and as the levy is paid per practice, constituents also include the practice staff employed by the practice.</p>  |
|    | <p><b>Purpose:</b> We process constituents' personal data in order to provide the services and work outlined in the agreement between your LMC and Londonwide LMCs, which includes the following purposes:</p> <ul style="list-style-type: none"> <li>▪ Administer lists of Representative GPs (as required under the LMC constitution) and practices and their practice staff.</li> <li>▪ To administer the LMC elections.</li> <li>▪ To consider and specifically deal with matters arising under section 97 of the NHS Act.</li> <li>▪ To negotiate with or between and to CCGs and other bodies</li> <li>▪ To encourage and assist in the development of services, activities and amenities to constituents.</li> <li>▪ Provide advice, support and training.</li> <li>▪ Seek and represent your views.</li> <li>▪ Keep you informed about LMC activities, provide key information and guidance across London, locally and nationally through our monthly newsletters and e-alerts.</li> <li>▪ Keep you informed on news relating to the Londonwide LMCs' buying Group.</li> <li>▪ Send out invites for attending events run by Londonwide LMCs Ltd and/or Londonwide Enterprise Ltd.</li> </ul> |
|  | <p><b>Lawful basis for the processing:</b></p> <p>The majority of our processing is carried out under UK General Data Protection Regulation (UK GDPR) Article 6 (1) (e) 'Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority invested in the controller'.</p> <p>Or under UK GDPR Article 6.1 (f) 'processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.'</p>  |
|  | <p><b>Personal data:</b></p> <p>Name<br/>Contact postal address.<br/>Contact email address.</p>  |




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|  | <p>Contact telephone number.</p> <p>Practice name(s) where you do most work.</p> <p>Date of birth.</p> <p>General Medical Council (GMC) number (for GPs).</p> <p>Gender.</p> <p>LMC area you do most work in.</p>  |
| <br><br> | <p><b>Who provides the personal data:</b></p> <p>Data subject: Constituents directly.</p> <p>Practice Managers and other practice staff on behalf of the practice.</p> <p>We receive a minimum data set from NHS England with the details of GPs joining or leaving the performers list, which includes name, contact address, contact email address (if provided), GMC number, Date of birth (if provided) and practice where they are working.</p>   |
|   | <p><b>Who we share your personal data with:</b></p> <ul style="list-style-type: none"> <li>• <b>Civica Election Services:</b> We provide names, contact postal and email address details of GPs to the Civica Election Services, who perform the role of independent scrutineer for the LMC elections and act as a Data Processor in this situation.<br/><b>NHS England:</b> We provide, on request, the names of practices and the names of principal GPs for those practices to NHS England to confirm levy mandates and payments.</li> <li>• <b>Exact Target/Salesforce Marketing Cloud:</b> We use Exact Target/Salesforce Marketing Cloud, acting as a data processor, to deliver our monthly e-newsletter and other emails. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve all of our e-communications.</li> <li>• <b>Savanta Group Limited:</b> We provide names, contact email address and the practice name (only where a GP or Practice Manager works at more than one practice) to ComRes, acting as a data processor, in order for them to send out our twice-yearly workforce survey.</li> <li>• <b>Your LMC:</b> We provide details of the names of GPs and the practices they work at for the LMCs as a list of the GPs they represent.</li> </ul> |
|   | <p><b>Personal data transfers outside of the EEA</b></p> <p>None.</p>  |
|   | <p><b>How long we retain your personal data</b></p> <p>When you retire as a GP, or are no longer registered on the NPL (national performers list), or you no longer work as a GP in an LMC area covered by Londonwide LMCs, unless you request to remain as a retired member on our database, we will lapse your record on the database keeping only minimum information including name, GMC number and work history, eg relationships to practices. For practice staff, their record will be lapsed when they no longer work in the areas covered by Londonwide LMCs.</p>   |

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|    | <p><b>How we store your data</b></p> <p>Your personal data is stored in our membership database provided to us by APT Solutions Ltd part of ClearCourse Partnership, who act as a data processor.</p>  |
| <h2>Committee Members</h2>  |  |
|    | <p>Committee members are GPs elected or co-opted by other GPs in their LMC area, onto a Local Medical Committee (LMC). Practice Managers and Practice Nurses are invited representatives on the LMCs.</p>  |
|    | <p><b>Purpose</b></p> <p>In addition to the purposes outlined under Constituents, we process committee members' personal data for the purpose of administering the committee, including the election process and payment of honoraria.</p>   |
|    | <p><b>Lawful basis for the processing:</b></p> <p>UK General Data Protection Regulation (UK GDPR) Article 6 (1) (e) 'Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority invested in the controller'.</p> <p>UK GDPR Article 6 (1) (b) 'Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract'.</p> <p>UK GDPR Article 6 (1) (c) 'Processing is necessary for compliance with a legal obligation to which the controller is subject'.</p> <p>Any special category data relating to access requirements and/or dietary preferences is processed under UK GDPR Article 9 (2) (b) 'processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject'.</p> <p>Any special category data, eg BMA number, is processed under UK GDPR Article 9 (2) (d) 'processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects'.</p> |
|  | <p><b>Personal data:</b></p> <p>In addition to the personal data described under constituents, we process:</p> <ul style="list-style-type: none"> <li>National insurance number, date of birth and financial details (including bank account and sort code) for processing and payment of honoraria payroll.</li> </ul>  |




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|  | <ul style="list-style-type: none"> <li>• BMA number (for those LMC members who attend the annual LMC conference as a conference representative).</li> <li>• Dietary preferences/access requirements.</li> </ul>   |
| <br> | <p><b>Who provides the personal data:</b></p> <p>Directly from the data subject: Committee members and invited representatives.</p>   |
|   | <p><b>Who we share your personal data with:</b></p> <p>We provide name, contact details, national insurance number, date of birth and financial details to Automatic Data Processing Limited, who act as a data processor for us, in order to process and pay honoraria.</p> <p>We provide the names of Officers (LMC Chairs and LMC Vice-Chairs) to the General Practitioners Committee (GPC) for the entry under your LMC for the GPC year book. We provide the names of the representative for each LMC to the General Practitioners Defence Fund.</p> <p>We provide details of the names of committee members to all constituents when we declare results of the LMC elections and the names of committee members are displayed on Londonwide LMCs' website <a href="http://www.lmc.org.uk">www.lmc.org.uk</a>.</p> <p>We provide details to HMRC for tax purposes.</p> |
|   | <p><b>Personal data transfers outside of the EEA</b></p> <p>None</p>  |
|   | <p><b>How long we retain your personal data</b></p> <p>When a committee member finishes their term of office or resigns from the committee, their personal information is retained on the payroll system until the completion of the next quarterly honoraria payment and in order to issue a P45.</p> <p>We need to keep the details of financial transactions for six years after the end of the financial year in which they were processed, in the event of the tax, payroll or accounting enquiry.</p>   |
|   | <p><b>How we store your data</b></p> <p>Your personal data, including your BMA number (if applicable) is stored in our membership database provided to us by APT Solutions Ltd part of the ClearCourse Partnership, who act as a data processor. In addition, your name, contact details, national insurance number, date of birth and financial details are stored in the Automatic Data Processing Limited payroll database.</p>  |

## Event Attendees








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|   | <p>Event attendees may be constituents but can also be non-constituents. They are anyone who attends an event run by Londonwide LMCs Ltd or Londonwide Enterprise Ltd.</p>   |
|   | <p><b>Purpose</b></p> <p>We process the personal data in order to run and manage the event the event attendee is attending. We may take photos or video footage of some events this will be made clear to all delegates prior to the day and at the start of the day.</p>  |
|   | <p><b>Lawful basis for the processing:</b></p> <p>UK General Data Protection Regulation (UK GDPR) Article 6 (1) (b) ‘Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract’.</p> <p>Or under UK GDPR Article 6.1 (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.’</p> <p>Any special category data relating to access requirements and/or dietary preferences is processed under UK GDPR Article 9 (2) (b) ‘processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject’.</p> |
|   | <p><b>Personal data:</b></p> <p>Name<br/> Contact postal address<br/> Contact email address<br/> Contact telephone number<br/> Practice name(s)<br/> Dietary preferences<br/> Access requirements<br/> Photos/Video footage taken at an event.</p>   |
| <br><br> | <p><b>Who provides the personal data:</b></p> <p>Directly from the data subject: event attendee or from the person booking the event on their behalf, eg a Practice Manager for a GP.</p>  |
|   | <p><b>Who we share your personal data with:</b></p> <p>We may share your name with the speakers or sponsors of an event and if this is the case, you will be informed. We may share names with our landlord, the</p>   |

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|   | British Medical Association, if the event is held at our office. We may also share access requirements with the Landlord if an individual PEP is required.   |
|  | <b>Personal data transfers outside of the EEA</b><br>None  |
|  | <b>How long we retain your personal data</b><br>We need to keep the details of financial transactions for six years after the end of the financial year in which they were processed, in the event of an accounting enquiry.   |
|  | <b>How we store your data</b><br>Your personal data is stored in our membership database provided to us by APT Solutions Ltd part of ClearCourse Partnership, who act as a data processor.<br><br>We don't store any payment card details, these are processed through the Stripe Payment Platform. <a href="https://stripe.com/gb/privacy">https://stripe.com/gb/privacy</a><br>Some of our free events are processed using Event Brite. <a href="#">event brite-privacy-policy</a> |




## Event Exhibitors, Event Sponsors, Event Speakers and Blended Learning Programme Trainers and Mentors







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|  | Event exhibitors, sponsors and speakers are normally non-constituents but may also be constituents. They are anyone who exhibits, sponsor or speaks at an event run by Londonwide LMCs Ltd or Londonwide Enterprise Ltd.   |
|  | <b>Purpose</b><br>We process the personal data in order to run and manage the event and/or run the training programme. We may take photos or video footage of some events this will be made clear to all delegates prior to the day and at the start of the day.   |
|  | <b>Lawful basis for the processing:</b><br>UK General Data Protection Regulation (UK GDPR) Article 6 (1) (b) 'Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract'.<br><br>Or under UK GDPR Article 6.1 (f) 'processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.'<br><br>Any special category data relating to access requirements and/or dietary preferences is processed under UK GDPR Article 9 (2) (b) 'processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by |



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|  | Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject’.  |
|   | <b>Personal data:</b><br>Name<br>Contact postal address.<br>Contact email address.<br>Contact telephone number.<br>Dietary preferences<br>Access requirements<br>Photos/Video footage at an event/training day<br>CVs for trainers and mentors. |
| <br><br> | <b>Who provides the personal data:</b><br>Directly from the data subject: event exhibitor contact, sponsor contact, speaker contact, trainer or mentor.   |
|   | <b>Who we share your personal data with:</b><br>We may share your name with the speakers or sponsors of an event and if this is the case, you will be informed.   |
|   | <b>Personal data transfers outside of the EEA</b><br>None   |
|   | <b>How long we retain your personal data</b><br>We need to keep the details of financial transactions for six years after the end of the financial year in which they were processed, in the event of an accounting enquiry.                    |
|   | <b>How we store your data</b><br>Your personal data is stored in our membership database provided to us by APT Solutions Ltd part of ClearCourse Partnership, who act as a data processor.  |







## Blended Learning Programme Students





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|  | Practice Managers, Practice Nurses or Health Care Assistants attending one of our blended learning training programmes. They may be a constituent or a non-constituent.   |
|  | <b>Purpose</b><br>We process the personal data in order to provide the blended learning training programmes.<br>We may take photos or video footage of some training days, this will be made clear to all delegates prior to the day and at the start of the day. |
|  | <b>Lawful basis for the processing:</b><br>UK General Data Protection Regulation (UK GDPR) Article 6 (1) (b) ‘Processing is necessary for the performance of a contract to which the data subject is party or   |

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|  | <p>in order to take steps at the request of the data subject prior to entering into a contract’.</p> <p>Or under UK GDPR Article 6.1 (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.’</p> <p>Any special category data relating to access requirements and/or dietary preferences is processed under UK GDPR Article 9 (2) (b) ‘processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject’.</p> |
|   | <p><b>Personal data:</b></p> <p>Name</p> <p>Contact postal address</p> <p>Contact email address</p> <p>Contact telephone number</p> <p>Date of Birth (required for accreditation)</p> <p>Gender, ethnicity, sexual orientation, religion (collected on a separate form and held as non-identifiable statistics)</p> <p>Dietary preferences</p> <p>Access requirements</p> <p>Photos/video footage taken at a training day</p> <p>Work submitted.</p>   |
| <br><br> | <p><b>Who provides the personal data:</b></p> <p>Directly from the student or from the person commissioning a group booking.</p>   |
|   | <p><b>Who we share your personal data with:</b></p> <p>Universities providing accreditation for the courses: University of Middlesex.</p> <p>Trainers and mentors providing support on the course.</p>   |
|   | <p><b>Personal data transfers outside of the EEA</b></p> <p>None</p>   |
|   | <p><b>How long we retain your personal data</b></p> <p>We need to keep the details of financial transactions for six years after the end of the financial year in which they were processed, in the event of an accounting enquiry.</p>  |




**How we store your data**








Your personal data is stored in a training database provided by Kent House Ltd. We don't store any payment card details, these are processed through the Stripe Payment Platform. <https://stripe.com/gb/privacy>

| Employees/Workers  |   |
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|   | All staff who have a contract of employment or a service agreement with Londonwide LMCs Ltd/Londonwide Enterprise Ltd   |
|   | <b>Purpose</b><br>We process the personal data in order to fulfil obligations of an employment contract, provide a safe working environment, and meet legal obligations.  |
|   | <b>Lawful basis for the processing:</b><br>UK General Data Protection Regulation (UK GDPR) Article 6 (1) (b) 'Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract'.<br><br>UK GDPR Article 6 (1) (c) 'Processing is necessary for compliance with a legal obligation to which the controller is subject'.<br><br>Or under UK GDPR Article 6.1 (f) 'processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.'<br><br>Any special category data is normally processed under UK GDPR Article 9 (2) (b) 'processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject'. |
|   | <b>Personal data:</b><br>Name<br>Contact details<br>Date of Birth<br>Gender<br>National insurance number/Passport/ID number<br>Work Permit/Visa details (for non-EU nationals)<br>Emergency contact details<br>Dietary requirements<br>Access requirements.   |
| <br><br> | <b>Who provides the personal data:</b><br>Employee/Worker   |


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|  | <b>Who we share your personal data with:</b><br>Landlord (British Medical Association) for access purposes.<br>General Practitioners Defence Fund for contact details.<br>HM Revenue & Customs, regulators (such as the ICO) and other authorities if required under law.<br>Pension providers for management of auto enrolment compliance.<br>Data processors, who assist in the operation of our organisation, including, Automatic Data Processing Limited for payroll and leave, Pension providers. |
|  | <b>Personal data transfers outside of the EEA</b><br>None   |
|  | <b>How long we retain your personal data</b><br>We need to keep the details of financial transactions for six years after the end of the financial year in which they were processed, in the event of an accounting enquiry.  |
|  | <b>How we store your data</b><br>In paper and electronic HR files, Payroll and leave system hosted by Automatic Data Processing Limited, who act as a data processor, Pension providers systems.  |










## Job Applicants


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|  | Any individual who applies for a position at Londonwide LMCs Ltd/Londonwide Enterprise Ltd  |
|  | <b>Purpose</b><br>We process the personal data in order to fulfil obligations of making pre-contract checks, providing a safe working environment, and meeting legal obligations.   |
|  | <b>Lawful basis for the processing:</b><br>UK General Data Protection Regulation (UK GDPR) Article 6 (1) (b) 'Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract'.<br><br>UK GDPR Article 6 (1) (c) 'Processing is necessary for compliance with a legal obligation to which the controller is subject.'<br><br>Or under UK GDPR Article 6.1 (f) 'processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.' |








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|  | Any special category data is normally processed under UK GDPR Article 9 (2) (b) 'processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject'. |
|   | <b>Personal data:</b><br>Name<br>Contact details<br>Right to work (is checked at interview but is not stored for applicants)<br>Ethnicity, gender, age, access requirements (captured on a separate form and are held in a non-identifiable form for equality monitoring)<br>Declaration of unspent convictions under the Rehabilitation of Offenders Act 1974 (the declaration forms are kept separately from the application forms or CVs).  |
| <br><br> | <b>Who provides the personal data:</b><br>Job applicant<br>Agency  |
|   | <b>Who we share your personal data with:</b><br>Interview panel<br>Names will be shared with the Landlord for access purposes to the office.   |
|   | <b>Personal data transfers outside of the EEA</b><br>None  |
|   | <b>How long we retain your personal data</b><br>We keep identifiable details for a period of 6 months after the interviews are concluded.  |
|   | <b>How we store your data</b><br>In paper and electronic HR files.   |

## Suppliers & Contractors


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|  | All suppliers and contractors who provide services to Londonwide LMCs Ltd/Londonwide Enterprise Ltd. |
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|   | <b>Purpose</b><br>We process the personal data in order to manage the contract and the services.   |
|   | <b>Lawful basis for the processing:</b><br>UK General Data Protection Regulation (UK GDPR) Article 6.1 (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.’ |
|   | <b>Personal data:</b><br>Name<br>Contact details   |
| <br> | <b>Who provides the personal data:</b><br>Data Subject directly or from the supplier company they work for.  |
|   | <b>Who we share your personal data with:</b><br>Landlord (British Medical Association) for access purposes   |
|   | <b>Personal data transfers outside of the EEA</b><br>None  |
|   | <b>How long we retain your personal data</b><br>Personal identifiable data will be held for as long as the contract is in place.<br>We need to keep the details of financial transactions for six years after the end of the financial year in which they were processed, in the event of an accounting enquiry.   |
|   | <b>How we store your data</b><br>In paper and electronic files.  |








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| <b>Press</b>  |   |
|  | All press contacts  |
|  | <b>Purpose</b><br>We process the personal data in order to manage press contacts.   |
|  | <b>Lawful basis for the processing:</b><br>UK General Data Protection Regulation (UK GDPR) Article 6.1 (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or |

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|  | fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.’ |
|   | <b>Personal data:</b><br>Name<br>Contact details<br>Company they work for.   |
| <br> | <b>Who provides the personal data:</b><br>Data Subject directly or from the company they work for.   |
|   | <b>Who we share your personal data with:</b><br>Landlord (British Medical Association) for access purposes                                       |
|   | <b>Personal data transfers outside of the EEA</b><br>None  |
|    | <b>How long we retain your personal data</b><br>Personal identifiable data will be held for as long as the contract is in place.                 |
|   | <b>How we store your data</b><br>In paper and electronic files.  |

## Visitors to our office

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|  | All visitors to our office.  |
|  | <b>Purpose</b><br>We process the personal data for security and safety reasons.<br><br>If your visit is planned, we'll send your name and visit information to our landlord, the British Medical Association's (BMA), security, who are our landlord, before your visit – so that we can print a personalised badge for your arrival. If you arrive without an appointment, you will be given a generic visitor badge. You must wear a pass throughout your visit. |
|  | <b>Lawful basis for the processing:</b><br>UK General Data Protection Regulation (UK GDPR) Article 6.1 (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.’                     |



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|   | <p><b>Personal data:</b><br/> Name<br/> Contact details<br/> Company they work for.</p> <p>Closed-circuit television (CCTV) used in the communal areas of the British Medical Association building is not operated by us, so we are not the controller. It is under the control of the building landlord, BMA.</p> |
| <br><br> | <p><b>Who provides the personal data:</b><br/> Data Subject directly or from the company they work for/representing.</p>   |
|   | <p><b>Who we share your personal data with:</b><br/> Name and the company they represent are shared with our Landlord, the BMA for access purposes</p>   |
|   | <p><b>Personal data transfers outside of the EEA</b><br/> None</p>   |
|    | <p><b>How long we retain your personal data</b><br/> Personalised badges will be destroyed when you leave the premises.</p>  |
|   | <p><b>How we store your data</b><br/> In electronic files.</p>   |

## Use of Cookies by Londonwide LMCs





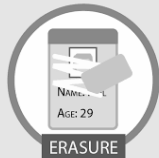



### Sharing your information

We will not share your information with any third parties for the purposes of direct marketing. We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. In the individual sections, we have detailed any specific instances of sharing with data processors.

In some circumstances we are legally obliged to share information. For example, under a court order, where sharing is required we will satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

## Your rights

As an individual whose data is processed by Londonwide LMCs Ltd or Londonwide Enterprise Ltd, you have the following rights:

|  |   |
|--|---|
|                                       | <a href="#">The right to be informed</a> – which is what this privacy notice is for   |
|                                       | <a href="#">The right to access the data we hold about you</a> This is commonly known as a 'subject access request'   |
|                                       | <a href="#">The right to object to processing</a> carried out in the public interest, please contact us on <a href="mailto:info@lmc.org.uk">info@lmc.org.uk</a> |
|                                      | The right to object to direct marketing – either use the unsubscribe button in an email or contact us on <a href="mailto:info@lmc.org.uk">info@lmc.org.uk</a>   |
|                                     | <a href="#">The right to erasure (right to be forgotten)</a> (in some circumstances)  |
| <small>Data Portability</small><br> | <a href="#">The right to data portability</a> (in some circumstances)   |
|                                     | <a href="#">The right to have your data rectified if it is inaccurate</a>   |
|                                     | <a href="#">Right to restrict processing</a>  |

## How to contact us and exercise your rights

Londonwide LMCs is not required to have a Data Protection Officer. The Data Protection Lead is the Associate Director of Data & Information Governance. To exercise any of your rights or if you have a data protection query, please contact us via [governance@lmc.org.uk](mailto:governance@lmc.org.uk).

If you are not satisfied with our response, or believe we are processing your personal data unlawfully or unfairly. Please contact us with your complaint by emailing [governance@lmc.org.uk](mailto:governance@lmc.org.uk), so we can try to resolve your concerns promptly and fairly.

You also have the right to lodge a complaint with the supervisory authority, which is the UK Information Commissioner, who you can contact via their [helpline](#) or as directed on their website [www.ico.org.uk](http://www.ico.org.uk). Under the Data (Use and Access) Act 2025, the Information Commissioner will require you to first raise your concern with us before investigating further. This ensures we have the opportunity to address the issue internally where possible.

Any future changes to this policy will be published on the website ([www.lmc.org.uk](http://www.lmc.org.uk)) and communicated to constituents. New versions of the privacy policy will be indicated by the version number and updated date.