

HOLBURN MEDICAL GROUP

Privacy Notice

Heidi Health Ltd

What is happening?

Holburn Medical Group have commissioned services from a company called Heidi Health Ltd to provide AI support in the production of clinical documentation, including transcribing consultations with patients.

Heidi is an AI medical scribe designed for clinicians. It uses speech recognition and Natural Language Processing (NLP) to transcribe clinical consultations and generate structured documentation.

It listens to the conversation you have with your clinician and takes notes automatically. This helps clinicians focus on what you are saying during the consultation and saves time with note taking, meaning we have more time for patients.

The notes are checked and corrected by clinicians after dictation or consultation, then uploaded to your patient records as normal. The clinician uploading the notes to your patient records is responsible for them. Your GP will set a retention period in the system for your information so it does not retain your data excessively.

Personal data and special categories of personal data

The data processed during a clinical consultation is unchanged. We will process your demographic data (name, address, date of birth, CHI number, contact details etc).

The special categories of data processed will be your health data and, where relevant, could include information about your sex life or sexual orientation, religion or other similar belief, or your ethnicity.

Your special category data is not used to train the software by the supplier. Your demographic data will be checked periodically to make sure that deidentification processes are working.

Data controller

Holburn Medical Group remain the data controller for your information. Heidi Health are our supplier (data processor) and have entered into a data processing agreement with us which sets the standards for the handling of your information. Their cyber security arrangements have been reviewed by colleagues in the cyber security team of NHS Grampian's Digital Directorate.

Lawful processing

We are processing your data further to our official authority and a task in the public interest as a GP practice governed by the terms of the General Medical Services contract in Scotland.

We are processing your special categories of personal data for the purposes of the provision of health and social care and the management of the health and social care system.

We may also process your data to protect vital interests (life), where we are obliged to do so, or in connection with legal matters.

Your rights

If you wish to update, access, erase, or limit or complain about the use of your personal data please let our Data Protection Officer (DPO) know in the first instance by contacting gram.infogovernance@nhs.scot or 01224 551549. We take DPO services from NHS Grampian.

You may also wish to contact the Information Commissioner's Office - <https://ico.org.uk/your-data-matters/raising-concerns/> or seek to enforce your rights through judicial remedy.

Privacy Notice Version History

Version	Change	Date
1	Drafted.	10 December 2025