

## **HOLBURN MEDICAL GROUP**

### **Privacy notice**

#### **Lexacom**

#### **What is happening?**

Holburn Medical Group have commissioned the following services from a company called Lexacom to provide digital dictation and automated transcriptions of our patient consultations.

- Digital dictation allows clinical staff to record audio that can be immediately sent to the practice secretarial team for simple prioritisation and audio transcription. It allows the most efficient use of the administrative resource and maintains a detailed audit trail.
- Speech recognition allows users to dictate words directly into any application where the cursor is positioned, reducing the time to create documentation and enter text onto the screen. Speech recognition can be combined with digital dictation so that audio sent to the secretarial team is joined by an accurate transcript, reducing the burden of audio typing.

#### **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.

#### **Data controller**

Holburn Medical Group remain the data controller for your information. Lexacom 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 under the control of NHS Grampian.

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](mailto: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.	1 May 2026
1.1	Clarified that digital dictation is included.	8 May 2026
1.2	Outlined services available to Practices	15 May 2026