

Kilcormac Medical Centre

Patient Privacy Notice

Use of AI Technology for Clinical Documentation

Why are we telling you this?

At Kilcormac Medical Centre, we are committed to providing you with the best possible care while protecting your personal information. We want to be open and transparent about how we use technology in our practice.

We use a secure AI (Artificial Intelligence) tool called Heidi Health to help our doctors prepare clinical notes and correspondence. This notice explains what this means for you and your data.

What does the AI tool do?

After your consultation, your doctor may use the AI tool to dictate their clinical notes. The doctor speaks their notes into a secure device, and the AI helps to organise and structure those notes into a clear, professional format.

This is similar to traditional dictation — where a doctor would speak their notes for a secretary to type up — but the AI does the organising instead.

In some cases, to help prepare an accurate referral letter or clinical note for you, your doctor may also upload a relevant document (such as a previous letter from a specialist or a previous clinical note) to the AI tool's context area. This is done only to help produce a more accurate record or letter for you. Your doctor will only upload documents that are directly relevant to your current care, and only where necessary.

What the AI tool does NOT do

Your consultation is NOT recorded. The AI tool is used only after your consultation, when the doctor is dictating their notes privately. At no point does the AI listen to or record any part of your appointment.

The AI tool does not:

- Record your voice or any part of your consultation
- Listen to conversations between you and your doctor
- Make any clinical decisions about your care
- Diagnose conditions or recommend treatments
- Access your full medical record automatically

All clinical decisions are made by your doctor. The AI is a documentation tool only.

What information does the AI process?

When your doctor dictates their notes, the content may include information discussed during your consultation, such as:

- Your name and date of birth
- Symptoms and medical history relevant to your visit
- Examination findings
- Diagnoses discussed
- Medications prescribed or reviewed
- Referrals or follow-up plans

Where your doctor uploads a relevant document to the AI tool, this may include information from previous clinical notes or letters that you have received from hospitals or specialists. Only information directly relevant to your current care will be uploaded. This is the same information your doctor would otherwise need to read and reference manually.

All of this information would appear in your medical record regardless of how the notes are prepared.

How is your information protected?

We have confirmed with our professional indemnity provider that our use of Heidi Health AI-assisted documentation is covered by our indemnity arrangements.

-  All data transmitted to and from the AI tool — including any uploaded documents — is encrypted and cannot be read if intercepted
-  Your doctor reviews and checks every note before it is saved to your medical record. No AI-generated note enters your record without your doctor's approval
-  The AI tool does not store your information permanently. Audio, notes, and any uploaded documents are deleted from the AI system after your doctor has confirmed the note
-  Your information is not shared with other patients, organisations, or used for marketing purposes
-  The AI provider (Heidi Health) is contractually bound to protect your data under a formal data processing agreement, subject to strict GDPR obligations
-  Heidi Health holds ISO 27001 certification and complies with GDPR and the Irish Data Protection Act 2018

What is the legal basis for this?

We process your health information under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (Ireland). The legal bases are:

We do not rely on your explicit consent as the legal basis for this processing. This is because the AI tool is used for clinical documentation — a core part of your healthcare record. You retain the full right to object to AI-assisted documentation at any time (see below), which provides the same practical protection as consent without risk to care continuity.

GDPR Article 9(2)(h)	Processing necessary for the provision of healthcare, carried out by a health professional bound by the obligation of professional secrecy. This covers both dictated content and any uploaded documents.
GDPR Article 6(1)(e)	Processing necessary for the performance of a task in the public interest (provision of GMS-contracted primary care)
Irish Data Protection Act 2018, Section 36	Conditions for processing special categories of personal data (health data) in an Irish healthcare context
Medical Council Guide (9th Ed., 2024)	Your doctor is bound by a duty of confidentiality in relation to all patient information, including information processed using this tool
Medical Council Position Statement on AI	The Medical Council of Ireland has issued a dedicated position statement on AI in clinical practice, requiring doctors to inform patients when AI tools are used for documentation, maintain AI competence through CPD, and comply with data protection obligations in the use of AI tools.

Your rights under GDPR

Under the GDPR and the Irish Data Protection Act 2018, you have the right to:

 Be informed	Know what data we hold and how we use it — this notice fulfils that obligation
 Access your data	Request a copy of your personal data held by the practice
 Rectification	Ask us to correct inaccurate information in your records
 Erasure	Ask for your data to be deleted in certain circumstances
 Restrict processing	Ask us to limit how we use your data in certain circumstances
 Object	Ask us not to use AI in the preparation of your clinical notes — we will always respect this. This includes the right to object to uploaded documents being used.
 Lodge a complaint	Contact the Data Protection Commission (DPC) if you are unhappy with how your data is handled

What if I don't want AI used for my notes?

You have the right to opt out at any time. If you would prefer that AI is not used in the preparation of your clinical notes — including that no documents are uploaded — please let your doctor or a member of staff know, or complete the Patient Preference Form available at reception. Your doctor will prepare your notes manually. This will not affect the quality of your care in any way.

International data transfers

Heidi Health uses Amazon Web Services (AWS) for cloud infrastructure. If your data is processed outside the European Economic Area (EEA) — including any documents uploaded to the context area — Heidi Health is required to ensure an appropriate transfer mechanism is in place (such as Standard Contractual Clauses) to protect your data to the same standard as within the EEA. We are in the process of confirming the specific data hosting arrangements for Irish users with Heidi Health.

Future regulatory developments

The EU AI Act (Regulation (EU) 2024/1689) introduces new rules for the use of AI systems in healthcare, taking effect from August 2027. We are monitoring developments and will update this notice as the regulatory framework evolves. We are committed to ensuring our use of AI technology remains compliant with all applicable legislation.

How long is your data kept?

Clinical notes become part of your permanent medical record and are retained in accordance with HSE and Medical Council guidance on medical record retention. Records are currently required to be kept for the life of the patient and for 8 years after the patient's death.

Audio recordings are not permanently stored — they are transcribed and then deleted. Uploaded documents are deleted from the Heidi Health system after your doctor has confirmed the note. We are confirming the exact deletion timeline for uploaded documents with Heidi Health and will update this notice accordingly.

Contact us

Practice Data Controllers: Dr Isabelle Fallon and Dr Aisling McMahon

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If you are unhappy with how your data is handled, you have the right to complain to the Data Protection Commission: www.dataprotection.ie | 1800 437 737 | 01 765 0100