

## Privacy Statement Radio Medical Service

The Radio Medical Service (RMD) of the Royal Dutch Sea Rescue Institution (KNRM) provides remote medical assistance in urgent and unforeseen situations on board a ship. All requests for medical assistance submitted to the RMD will be processed.

### 1. Medical advice via a radio connection

Radio Medical Advice (RMA) is medical advice given via a telecom connection (satellite telephone or email) to a ship without a doctor on board. The first mate on board is trained to provide first aid, but is not allowed to make diagnoses or administer medication, which requires a doctor's prescription. It is therefore important to obtain radio medical advice.

### 2. The KNRM Radio Medical Service

The RMD of the KNRM is provided by BIG-registered general practitioners. The RMA doctor on duty ashore asks questions about the patient's symptoms and, based on the findings of the first mate, advises on the appropriate treatment, whether or not a ship should be speeded up to shore or whether the patient should be evacuated. In the performance of those duties personal data will be requested and recorded and therefore processed by the RMD.

In addition to providing medical advice, the RMD is also charged with organising medical evacuations of seafarers. In carrying out these tasks, the RMD requests and records personal data and information.

### 3. Which personal data?

When the RMD of the KNRM is called upon, an exchange of information takes place between a ship (usually the captain or first mate) and the RMD doctor on duty ashore. The RMD doctor makes a diagnosis from the symptoms that are transmitted via radio or satellite. Depending on the situation, the RMD doctor can then give instructions, prescribe medication or determine that a medical evacuation is necessary.

In order to give appropriate medical instructions or advice to the first mate, it is necessary to provide all necessary (personal) information regarding the patient's state of health. If a medical evacuation has to be initiated, it is also necessary to provide the patient's identity.

For each request for assistance, the RMA doctor then draws up a report at ship level of what has occurred. This includes the correspondence conducted, a summary of the incident and the ship's (sailing) data. In the event of a medical evacuation, the patient's name, date of birth, nationality and state of health are also recorded in the report.

For a correct triage or diagnosis, photographs can be shared with the RMD doctor by e-mail or telephone. These photos - as well as the correspondence conducted - become part of the file. In some cases, the patient's identity can be deduced from them. In addition, the patient's identity can be indirectly derived from the circumstances recorded (e.g.: name of ship + function of patient)

#### **4. Recording on board**

The RMD of the KNRM is not responsible for the manner in which the incident (by the responsible captain) is recorded on board of the ship, nor for the management of that data and the systems involved.

#### **5. Communication with the RMD**

There are various communication possibilities to request a Radio Medical Advice, namely via VHF radio, transceiver, e-mail or by (satellite) telephone. In most cases, contact between a ship and the RMD of the KNRM is established through the intervention of the Coastguard Centre involved. The KNRM is aware that the Dutch Coast Guard records telephone traffic for the purpose of monitoring the effectiveness of their maritime assistance. For more information see the [privacy statement](#) of the Dutch Coastguard.

In case of an e-mail consultation, no Coastguard Centre is involved, this contact is directly with the RMA doctor on duty.

#### **6. Exchange of data**

In the event of a necessary medical evacuation and/or referral to a nearby hospital, it may be necessary to exchange verbal, written or digital (personal) data with the help or care providers involved. In the event of a foreign incident, the request for assistance may also be transferred to another (foreign) RMD (through the intervention of the Coastguard).

#### **7. Retention period**

Reports are kept for no longer than is necessary for the provision of proper assistance or required by law. For medical data, this retention period is in principle 20 years (from the last treatment), unless longer retention is necessary.

#### **8. Your rights: access, correction and deletion**

There may be a need to request the report from the RMD for various reasons. You have the right to know whether and which personal data the RMD of the KNRM has recorded about you. If you wish to exercise this right of access, we will only be able to process your request if your request contains sufficient (correct) information. After all, we are not allowed to give you incorrect information or access to other people's personal data.

You also have the right of correction in the event that your data or information proves to be incorrect and you have the right to (partial) deletion of your data. The latter can only be accommodated if your data does not need to be kept on the grounds of any important interest or statutory regulation.

You can send such requests to the KNRM with your contact details: P.O. Box 434, 1970 AK IJmuiden or by e-mail: [privacy@knrm.nl](mailto:privacy@knrm.nl). A staff member may contact you by telephone to verify your identity.

#### **9. Questions or complaints**

Do you have a substantive question or a complaint about the assistance provided by the RMD? If so, a KNRM RMD doctor on duty will be pleased to discuss it with you.

We have a complaints procedure in accordance with the Quality, Complaints and Disputes for Care Act (Wkkgz). A copy of the complaints procedure of the KNRM can be requested via [secretariaat@knrm.nl](mailto:secretariaat@knrm.nl). The KNRM is also affiliated with the Foundation for Complaints and Disputes Primary Care (SKGE). If the KNRM or our RMA-doctors are not able to help you satisfactorily, you can report this to the independent Disputes Authority Primary Care.



Should you have any questions about this privacy statement or complaints about the way in which the RMD deals with your data or rights, please contact the KNRM's Data Protection Officer via [privacy@knrm.nl](mailto:privacy@knrm.nl) or via the contact details below. You also have the right to [submit a complaint directly with the privacy authority, the Dutch Data Protection Authority \(AP\)](#).

Royal Dutch Sea Rescue Institution (KNRM)  
To the attention of the Data Protection Officer  
Haringkade 2  
1976 CP IJmuiden

Version: January 2021