

# Privacy Policy

Your trust and safety is very important to us. This Privacy Policy together with the [Terms and conditions](#) will help you understand how we use and protect your data. We comply with the European Union directive for personal data protection and will comply with GDPR (General Data Protection Regulation) by May 2018. Should you have any questions, please contact us at [privacy@meditsimple.com](mailto:privacy@meditsimple.com).

## 1. Introduction

MEDface LTD and other affiliated companies (we, us or MEDitSimple), providing services to health professionals and patients (collectively, the Users) are committed to safeguarding the privacy of personal information we use or collect on our website [www.meditsimple.com](http://www.meditsimple.com) (the Website) and other related websites, applications, services and mobile applications provided by MEDitSimple and any of its subsidiaries or related companies (the Services). In this policy, we explain how we handle your personal information.

By using our services and accepting our privacy policy, you agree to the practices we adopt for handling your data. If you do not agree with this privacy policy, you cannot use our services. Should you use the services on behalf of someone else (such as your child) or an entity (such as your employer), you bear full responsibility for checking that you are authorised by such individual or entity to accept this privacy policy on such individual's or entity's behalf.

MEDFace is the data controller and our data controller registration number is **A8189739**. We reserve the right to amend or modify this Privacy Policy at any time and in response to changes in applicable law. If we change our Privacy Policy we will post the changes on this page so that you are aware of any amendments.

## 2. What information we may collect from you

We may collect and process the following information about you whether you are a health professional or a patient as defined in the [Terms and conditions](#):

- ▶ Personal information that you provide to us
  - Information that you provide to us when registering with our website including your email address, your name, your mobile number, your date of birth and your gender and your postal address.
  - Information contained in or relating to any communication that you send to us or send through our website, including the communication content and metadata associated with the communication;
  - The appointments you have scheduled with the details attached, including, time and date, the health professional you, their specialisation, the reason for your visit, if you have seen this doctor before, a description of your symptoms if you have decided to inform the doctor through our service, any message you may have left to a health professional through our website.
  - The patients details contained in the appointment when a patient books online or when you book a patient in our online agenda or when you enter a new patient in your patient's list.
  - Medical notes that you store in each appointment during or after a consultation.

We will hold the above information no longer than necessary to deliver you the service or otherwise as is required by law or any relevant regulatory statute.

Before you disclose to us the personal information of another person, you must be sure to have obtained that person's express consent to both the disclosure and the processing of that personal information in accordance with this policy.

Any subscriber to our service may request to have their information removed from our system at [unsubscribe@meditsimple.com](mailto:unsubscribe@meditsimple.com)

▶ Traffic information

- End-user device information (such as your hardware model, operating system version, unique device identifiers, IP address, and mobile network information) for system administration. This is statistical information about our users' browsing actions and patterns. If you download our mobile application, we may receive information about your geo-location if the device permits it.
- Details of your visits to the Website, including but not limited to, the IP address used to connect your computer to the Internet, specific web-pages and resources accessed on our website as well as geo-location data where the device permits it.

▶ Medical Notes

- Personal Health Records (PHR) are only shared with the intended health care professional/s chosen by the subscribing subject for the purpose of their medical treatment. The subscriber may withdraw access to their PHR from any medical professional if they so wish at any time.
- Other, non-medical, Personal Identifiable Information (PII) is kept confidential with strict access controls and not shared with any other service user or external 3<sup>rd</sup> party under any circumstances unless required by law and/or medical regulations or with the subject's explicit consent.
- Health professionals may use our online data store to maintain their Electronic Health Records (EHR) on each of their past patient appointments. These medical notes will be protected in storage by the use of encryption and can only be accessed with the health professional's unique credentials. The health professional may share this information with his/her assistant if they deem necessary and with other health professionals, but only with the patient's explicit consent. At that point the protection of the data handled by the health professional outside our system becomes their sole responsibility and they become entrusted with maintaining it securely in accordance to their own medical codes of practice and ethics.

### 3. How do we collect information?

We will collect information about you when you interact with our Website and Services. Such information is collected when:

▶ As a subscribing service user:

- Use our online and interactive services, such as searching for healthcare professionals, searching for available appointments.
- Book an appointment through the website with health professionals registered with us.
- Create an account on the website and register.
- Ask for information from us.
- Download any software that we make available.

▶ As a subscribing health professional:

- You register with us.
- You create, look at or change your website profile with us.
- You ask for information from us.
- A patient is viewing your profile.
- A patient is booking with you.
- You are using our online data store.

▶ As a general website visitor:

If you are a user of the website, we will collect information through cookies, website analytics services and other tracking technology. These information are not personal and are useful to us to better understand visitors behaviours from a statistical point of view.

### 4. Why do we collect these information from you?

We collect information from you to provide you with the Services and improve them, including to:

- Administer our website and business.

- Personalise our website for you.
- Enable your use of the services available on our website.
- Send you email notifications that you have specifically requested, including to remind you of an upcoming appointment.
- Send you targeted marketing communications of interest where explicit consent has been obtained.
- Share anonymised statistical information about our users with partner 3<sup>rd</sup> parties.
- Deal with enquiries and complaints made by or about you in relation to our website.
- Keep our website secure and prevent fraud.
- Verify compliance with the terms and conditions governing the use of our website.
- Contact you when necessary including to remind you of an upcoming appointment.
- Administer your account.

## 5. When do we disclose the information we collect from you?

We may share your Personal Information with Healthcare Providers with which you choose to schedule through the Service. For example, if you enter a reason for visit or a comment while booking through our website, we may share these elements with your Healthcare Providers. You also may choose not to share these elements by not entering in the booking form in the first place.

We may share your Personal Information with your Healthcare Providers to enable them to refer you to and make appointments with other Healthcare Providers on your behalf or to perform analyses on potential health issues or treatments, provided that you choose to use the applicable Services.

We may share your Personal Information with Healthcare Providers in the event of an emergency.

We also may need to disclose your Personal Information or any other information we collect about you if we determine in good faith that such disclosure is needed to: (1) comply with applicable law, regulation, court order or other legal process; (2) protect the rights, property or safety of MEDitSIMPLE or another party; (3) enforce the Agreement or other agreements with you; or (4) respond to claims that any posting or other content violates third-party rights.

We will never disclose any of Personal Health Records without your consent to any third parties or business partner of any kind.

## 6. Where do we store your personal information and how we keep it secure?

### ▶ Storage of your personal information

We store and process your information on cloud-based encrypted servers in the European Union. We maintain industry standard backup and archival systems. Personal Health Records about patients are encrypted and access controlled making them available only to intended and authorised health professional(s).

### ▶ International data transfers

Information that we collect will never be transferred to countries which do not have data protection laws equivalent to those in force in the European Economic Area or outside the European Union.

### ▶ Updating personal information

It will be the responsibility of the service subscribers to keep their information current and accurate.

Health professionals who are using the Website are entirely responsible for updating their profile as well as their patients' medical information. Should they need to update their profile, they can write to us at [contact@meditsimple.com](mailto:contact@meditsimple.com) to let us know about any change they would like to bring forward.

► Information retention regime

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Without prejudice to the above, we will usually delete personal data falling within the categories set out below at the date/time set out below:

- Patient profile and personal health records if the patient unsubscribes from the platform.
- In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

While using the Services, health professionals are solely responsible for managing the patient's health records they created through the Website to the extent that we are required to do so by law.

► Security of personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

The security of our Services and the information they store, process and transmit is a top priority. To prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of the information we collect, we deploy a wide range of technical, physical and administrative safeguards. Such safeguards include by example,

- periodic management reviews of security;
- security risk assessments;
- technical security measures such as secure design and architecture and security enforcing controls such as access control models and encryption;
- independent assurances obtained via 3<sup>rd</sup> party assessors and security certifications.

The service subscriber is expected to and must own total responsibility for safeguarding any credentials used for accessing the service.

## 7. Data protection registration

We are registered as a data controller with the UK Information Commissioner's Office.

Our data protection registration number is **A8189739**

This website is owned and operated by MEDFace LTD

We are registered in England and Wales under registration number 09923865 and our registered office is at

Kings Lodge London Road, West Kingsdown, Sevenoaks, Kent,  
United Kingdom, TN15 6AR

Our principal place of business is at 2 St Stephens avenue, London W128JH, UK.

You can contact us by writing to the business address given above, by using our website contact form, by email to [contact@meditsimple.com](mailto:contact@meditsimple.com).

## 8. Your rights about your personal information under GDPR?

All our service subscribers have access to their own information at all times to view and have the right to update it to maintain its accuracy.

**Right of access:** You have the right to obtain access to your own personal data at any time so you are aware of and can verify the lawfulness of processing. Information will be supplied within one month of receipt of the request. This can be extended by a further two months where requests are complex or numerous. This will be provided free of charge unless you ask for multiple copies or the request is manifestly unfounded or excessive. We can also refuse your request if it adversely affect the rights and freedoms of others or is manifestly unfounded or excessive. You can make a subject access request by contacting [privacy@meditsimple.com](mailto:privacy@meditsimple.com).

Should you be a registered patient on the platform, you can log into your account and ask each of the health professionals you interacted with through the platform to send your medical data to you in an electronic format using the relevant action button.



**Right of rectification:** You have the right to have your personal data rectified if it is inaccurate or incomplete.

We must respond within one month, extendable by two months where the request for rectification is complex.

Should you be a health professional on the platform, you can log into your account and modify your public profile and the information on your account using the relevant features.

**Right of erasure:** You have the right to request the deletion of personal data where there is no compelling reason for its continued processing or if we are processing it in an unlawful manner – for example if we are using it for a different purpose than originally stated.

**Right to restrict data processing:** Under certain circumstances, you have a right to 'block' or suppress processing of personal data. When processing is restricted, we are permitted to store the personal data, but not further process it. We can retain just enough information about you to ensure that the restriction is respected in future.

Should you be a registered patient on the platform, you can go into your account and ask your data to be erased for each of your practitioners individually. Should you be a registered patient on the platform, you can go into your account and ask your data to be erased in “your account”.

**Right to data portability:** You can obtain and reuse your personal data for your own purposes across different services. This right applies where the processing is based on your consent or for the performance of a contract; and when processing is carried out by automated means.

Should you be a registered patient on the platform, you can go into your account and ask your medical data to be sent to you in an electronic format logging into “your account”.

**Right to object:** You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- Direct marketing (including profiling); and
- Processing for purposes of scientific/historical research and statistics.

If we process personal data for the performance of a legal task or our organisation's legitimate interests, you must have an objection on "grounds relating to your particular situation"

We must stop processing the personal data unless:

- We can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or

- The processing is for the establishment, exercise or defense of legal claims.
- The Personal Data is essential to the continuation of the tenancy or is in the 'vital interests' of the tenant.

**Right to Withdraw Consent at any Time:** You may contact MEDItSimple to request this. You can also delete your account from our platform, should you wish to.

Should you be a registered patient on the platform, you can withdraw your consent for a specific health professional to continue holding medical data on the platform about you. To do so, simply log into your account and follow the instructions. Should you have another type of query, please write to [privacy@meditsimple.com](mailto:privacy@meditsimple.com).

**Right to complain:** about any matter relating to our service, including how we use your personal data:

- In the first instance please contact us at **[contact@meditsimple.com](mailto:contact@meditsimple.com)**
- If you wish to complain about our use of your personal data you may complain to the UK Information Commissioner's Office (ICO) at [ico.org.uk](https://ico.org.uk)

## 9. Amendments

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of changes to this policy by email or through the private messaging system on our website.

## 10. Cookies

A cookie is a small piece of text sent to your browser by a website you visit. It helps the website to remember information about your visit, like your preferred language and other settings. That can make your next visit easier and the site more useful to you. Cookies play an important role. Without them, using the web would be a much more frustrating experience.

We use cookies for a number of purposes. We use them, for example, to remember your preferences, to count how many visitors we receive to a page, to help you sign up for our services and to protect your data.

- We use 'Analytics' type cookies that help website and app owners to understand how their visitors engage with their properties. It may use a set of cookies to collect information and report website usage statistics without personally identifying individual visitors.
- We use 'Security' type cookies to help in the user authentication process and prevent fraudulent use of login credentials, and protect user data from unauthorised parties.
- We use 'Session' type cookies to collect information about how users interact with our website. This may include the pages users visit most often, and whether users get error messages from certain pages. We use these so-called 'session state cookies' to help us improve our services, in order to improve our users' browsing experience.
- We use 'Process' type cookies to help make the website work and deliver services that the website visitor expects, like navigating around web pages or accessing secure areas of the website. Without these cookies, the website cannot function properly.
- We use 'Preferences' type cookies to allow our website to remember information that changes the way the site behaves or looks, such as your preferred language or the region you are in. For instance, by remembering your region, a website may be able to provide you with local news information. These cookies can also assist you in changing text size, font and other parts of web pages that you can personalize.

## 11. Links to Other Websites

The Services contain links to third party websites with which MEDitSIMPLE has no affiliation. A link to a non-MEDitSIMPLE website does not mean that we endorse that website, the quality or accuracy of information presented on the non-MEDitSIMPLE website or the persons or entities associated with the non-MEDitSIMPLE website. If you decide to visit a third party website, you are subject to the privacy policy of the third party website as applicable and we are not responsible for the

policies and practices of the third party website. We encourage you to ask questions before you disclose your information to others.