

MediOffice Ltd

Privacy Policy

Who we are and what we do

MediOffice Ltd respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after personal data and sets out the basis on which any personal data we are provided with about you, collect from you, or that you provide to us, will be processed by us.

Your visit to www.medioffice.co.uk or our MediOffice mobile application which is referred to as the "Site" is subject to the terms set out in this privacy policy. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

MediOffice is the data controller and responsible for your personal data (referred to as "we", "us" or "our" in this privacy policy).

We use the information that we collect from you to provide our services to you. In addition to this we may use the information for one or more of the following purposes:

- a. To provide information to you that you request from us relating to our products or services.
- b. To provide information to you relating to other products that may be of interest to you. Such additional information will only be provided where you have consented to receive such information.
- c. To inform you of any changes to our website or mobile application, services or goods and products.

If you have previously purchased goods or services from us we may provide to you details of similar goods or services, or other goods and services, that you may be interested in.

This policy is updated from time to time. The latest version updated in July 2021 is published on the Site. All updated versions of the policy will be published on the Site.

Information we may collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you visit the Site or correspond with us by phone, e-mail or otherwise you may give us information that would be classed as personal data about you and others you are acting on behalf of. We may collect, use, store and transfer different kinds of personal data about you when you do so which we have grouped together follows:

- a. **Identity Data** which includes first names, last names, username or similar identifier, marital status, title, date of birth and gender.
- b. **Contact Data** which includes billing address, your company registered address, home address, email address and telephone numbers.

- c. **Health Data** which includes any information about health including medical history and/or current health status including but not limited to data regarding test results, diagnoses and medications.
- d. **Financial Data** which includes bank account and payment card details.
- e. **Transaction Data** includes details about payments to and from you and details of products and services purchased from or through us.
- f. **Technical Data** includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Site or mobile application.
- g. **Profile Data** which includes username and password or any accounts set up to access our products and services, purchases or orders made by customers, feedback responses.
- h. **Usage Data** which includes information about how you use our Site and mobile application, products and services.
- i. **Marketing and Communications Data** which includes individual preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website or mobile application feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Except where we are acting as a data processor on behalf of customers where we collect and store data about the health of our customers clients or staff we do not collect any Special Categories of Personal Data (as defined in GDPR).

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Keeping your data secure

We know that data security is important to you and it is therefore important to us. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions in accordance with this policy and they are subject to a duty of confidentiality.

- Electronic data is backed up through our data centre provider.
- Our computers are all password protected and only authorised employees can access the data.
- Emails containing personal data are password protected and encrypted where appropriate

- The access to some data is restricted on a required only basis.
- Paper documents containing personal data are stored in locked cabinets.

We have put in place procedures to deal with any suspected personal data breach and will notify our customers, you or any applicable regulator of a breach where we are legally required to do so.

How we will collect data

We use different methods to collect data from and about individuals including through:

- a. **Direct interactions.** Individuals may give us any of the categories of data identified above by filling in forms on our Site and mobile application or by corresponding with us by phone, e-mail or otherwise. This includes personal data you provide when you:
 - register to use our Site and mobile application;
 - make a request for our products or services;
 - request marketing communications to be sent to you;
 - give us some feedback.
- b. **Automated technologies or interactions.** As you interact with our Site and mobile application, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy below for further details.
- c. **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as insurance providers, analytics providers, advertising networks and/or search information providers based inside or outside the EU, including for example Google Analytics, Buffer, Twitter.
- d. **Health Data** from facility providers and providers of insurance services such as HCA Healthcare, AXA PPP, BUPA based inside and outside the EU.
- e. **Contact, Financial and Transaction Data (if applicable)** from providers of technical, payment and delivery services such as Worldpay based inside the EU.
- f. **Provided to us by Customers.** Where we are providing payroll or client invoicing services to our clients, we will be passed personal data concerning their staff and patients which we hold, store and process as a data processor.

Why we will use your data

The lawful bases for processing personal data are set out in Article 6 of the General Data Protection Regulation (GDPR). We may process your personal data on more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out below. At least one of these must apply whenever we process personal data:

- a. **Consent:** you have given clear consent for us to process your personal data for a specific purpose.
- b. **Contract:** the processing is necessary for a contract we have with you (for example, to process and deliver goods or services to you and to manage our relationship with you), or because you have asked us to take specific steps before entering into a contract or because we are acting as a data processor on behalf of a third party who has a contract with you for the provision of services.

- c. **Legal obligation:** the processing is necessary for us to comply with a legal or regulatory obligation (not including contractual obligations).
- d. **Vital interests:** the processing is necessary to protect someone's life.
- e. **Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- f. **Legitimate interests:** the processing is necessary for our legitimate interests (for example to administer and maintain our website or mobile application) or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Click [here](#) to find out more on the Information Commissioner's Office website or mobile application about the types of lawful basis that we will rely on to process your personal data.

Disclosing your personal data

We may have to share your personal data with the parties below in order to provide our services to you. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Examples of our third parties include:

- a. Sub-contractors for the performance of any contract we enter into with them or you;
- b. Service providers acting as processors who provide IT, software and system administration services.
- c. Professional advisers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.
- d. Professional service providers such as our payroll company, pension provider.

Cookies

Consider whether you want a digital log of your visit to our Site and mobile application to be recorded in your browser. If you don't want a record to be kept, you can choose to delete your browser history afterwards or view our pages in incognito mode / private browsing, which won't store your browser history, cookies, or search history after you've closed your browsers. However, you are not invisible. Using incognito mode / private browsing does not hide your browser history from your internet service provider, us or your employer (if you are using a company device).

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Site and mobile application may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased Services from us and, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any other company for marketing purposes.

You can ask us to stop sending you marketing messages at any time by emailing us on admin@medioffice.co.uk or by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase of goods or services from us.

How long we will keep data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. If we are supplying services to you, generally this means we will retain your personal data for the duration of the contract between us.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to access the Information Commissioner's Office website to find out more about these rights:

- a. [Request access to your personal data.](#)
- b. [Request correction of your personal data.](#)
- c. [Request erasure of your personal data.](#)
- d. [Object to processing of your personal data.](#)
- e. [Request restriction of processing your personal data.](#)
- f. [Request transfer of your personal data.](#)
- g. [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee to cover our time if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.