

Healthcare Communications UK Ltd

# Privacy Policy – Envoy Messenger

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Document Version: <version 3.0>

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# 1 Document Revision

<b>Title</b>	<b>Privacy Policy</b>
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Date	March 2021
Version	<version 3.0>
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QA:	<QA Names>

<b>Rev</b>	<b>Date</b>	<b>Revision Description</b>
	May 2018	Updated in line with GDPR regulations
	Sept 2020	Updated in line with IMIMobile Europe Ltd
	March 2021	Revisions in line with domain uses.
	April 2022	Section 2.1 updated to expand on details of data items processed

## 2 Privacy Policy

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. It covers personal data of our clients (each client of ours shall be referred to in this Privacy Policy as a **Contracting Authority**) and any personal data of the Contracting Authorities' service users that may use our services to process (in those cases we are the data processor working on the instructions of the relevant Contracting Authority).

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [nhsportal.net](http://nhsportal.net), [ratemy NHS.co.uk](http://ratemy NHS.co.uk) and/or [eclinic.org.uk](http://eclinic.org.uk) you are accepting and consenting to the practices described in this Privacy Policy.

For the purpose of the EU General Data Protection Regulation 2016/679 (the GDPR) and any subsequent UK legislation on data protection, the data processor Healthcare Communications, a subsidiary of IMImobile Europe Limited of 5 St John's Lane, London, EC1M 4BH. The data controller is the Contracting Authority relevant to you.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions or you would like to make a request to exercise any of your legal rights, please contact the DPO using the details set out in the "Contact and Complaints" section below.

### 2.1 Information we may collect from you

We may collect and process the following data about you:

When your healthcare provider asks us to communicate with you, we ask for personal information about yourself so we can match you, this could include:

- **Non-Registered User: Date of Birth**
- **Registered User – Email address**

When you are using one of our services you may give us personal information to pass back to your healthcare provider, this could include:

- **Feedback on the healthcare provider service**
- **Medical assessment information**
- **Appointment confirmations, cancels or rebook notifications.**

As part of the Patient Engagement Platform, we may collect personal information about you from your healthcare provider. This information includes:

- Name
- Phone number

- Date of birth
- Gender
- Email
- Postal Address
- Default language preference
- Images, chat conversation, document sharing – video consultation only
- Demographics, including, Gender, Disability, Ethnicity, Religion or Belief, Sex, and Sexual Orientation
- Consent to contact
- Referral and appointment notifications and correspondence
- Clinical notifications and correspondence, this does not amount to your full medical or health record.
- Waiting list details if you are waiting for an upcoming appointment
- If you are on a Patient Initiated Follow Up

We use third parties to process data under contract to provide our services and may share some of your personal details as part of this process.

Suppliers we use are:

- IMI Mobile – Sends SMS and emails to deliver our services, including staff notifications, and notifications including Feedback on the healthcare provider service, medical assessment information, Appointment confirmations, cancels or rebook notifications.
- CM Telecom - Sends SMS to deliver our services, Feedback on the healthcare provider service, medical assessment information, Appointment confirmations, cancels or rebook notifications.
- Comify - Sends SMS & Voice to deliver our services, Feedback on the healthcare provider service, medical assessment information, Appointment confirmations, cancels or rebook notifications.
- Microsoft Azure – hosting and database
- Vonage – video consultation platform
- Salesforce – Log service requests
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We do not sell your personal to third parties. We use your information you provide us to deliver our services to you. We use third parties to process data under contract to provide our services and may share some of your personal details as part of this process. We do not have access to your medical or health records.

**Information you give us.** You may give us information about you by filling in forms on our sites [nhsportal.net](http://nhsportal.net), [ratemyhhs.co.uk](http://ratemyhhs.co.uk) and/or [eclinic.org.uk](http://eclinic.org.uk) (our sites) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register/subscribe to use our site, participate in discussion boards or other functions on our sites, including surveys, forms, submit contact details, and/or when you report a problem with our site. The information you

give us may include your name, address, e-mail address and phone number, personal description and images, and whether or not you consent to being tracked.

You are responsible for ensuring that the personal data which you give us is accurate and up to date.

**Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products and services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

**Information we receive from other sources.** We may receive personal data about you from various third parties and public sources as set out below. We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties only where expressly permitted by the Contracting Authority in order to deliver services in line with the contracted requirements (including, for example, business partners, sub-contractors in technical and delivery services) and may receive information about you from them.

We collect technical data from the following:

- Analytics providers such as Google, and BrowseAloud based inside and outside the EU.
- We may 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.
- We may collect any “Special Categories of Personal Data” about You (e.g. your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinion, trade union membership, information about your health and genetic and biometric data). We do not collect information about criminal convictions and offences.

## 2.2 Cookies

Our site uses different analytics scripts which may use cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

For more information, please see our Cookie Policy.

## 2.3 How we use your information

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from any contracts entered into between us and the Contracting Authority;
  - to notify you about changes to the service;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.

You are responsible for ensuring that the personal data which you give us is accurate and up to date.

- **Information we collect about you when you visit our site.** We will use this information:
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of the service, when you choose to do so;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of communication we serve to you and others;
- **Information we receive from other sources.** We may receive personal data about you from various third parties and public sources as set out below. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

- **Legal Bases for processing of data.** We have identified the following legal bases on which we rely for the above processing of data:
  - Processing necessary to comply with a legal obligation (performance of our contract with the Contracting Authority);
  - Processing necessary for our legitimate interests, such as to keep our records updated and to study how users use our services, to study how users of the sites use the sites, to develop them and grow our business and for running our business, provision of administration and IT services, network security, to prevent fraud).
  - **Note:** we may process your personal data for 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.

## 2.4 Disclosure of your information

We will not share your personal information with any member of our group (both inside and outside the EEA), which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will disclose your personal information to the Contracting Authority under whom we are collecting data on behalf of:

We do not process your personal data for marketing purposes (including profiling).

We do not share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Regulatory due diligence check which may involve personal data.

We may disclose your personal information to third parties:

- If Healthcare Communications or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of IMLmobile Europe Limited (including our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of



the UK Companies Act 2006), our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 2.5 Your rights

We endeavour to process all personal data in line with your rights under the GDPR. In particular, you have the following rights:

- a. Where we are relying on your consent to process your personal data, you can withdraw your consent to our processing your personal data at any time. You can do this at any time by changing Your “preferences” with the Contracting Authority.
- b. In certain circumstances, we can process your personal data without your consent in line with the lawful processing requirements in GDPR. These include (amongst other reasons) where processing is necessary to carry out a contractual obligation between us, to comply with a legal obligation, or to protect your vital interests.
- c. Contact the Contracting Authority to rectify inaccurate or incomplete personal data.
- d. Ask Us to erase your personal data. This is commonly referred to as the right to be forgotten. This right is only applicable where there is no compelling reason for the continued processing of your personal data. There are some circumstances where this right to erasure does not apply and in such cases, we would notify you of the reason(s) why we need to retain your personal data (unless prevented to do so by law).
- e. Restrict processing of your personal data where, for example, the data is inaccurate, being processed unlawfully or where the data is no longer relevant to the specific purpose for processing. In such cases, we would retain the data but we would not process it further without consent of the Contracting Authority, or if processing your data is for establishing, exercising or defending a legal claim, or for the protection of rights of other individuals, or for public interest reasons. In such circumstances, we would let the Contracting Authority know that we intend to lift the restriction on processing your personal data.
- f. Request access to your personal data via a subject access request. Your request should be made to us in writing by email to [enquiries@healthcomm.uk](mailto:enquiries@healthcomm.uk) and we may ask you for proof of your identity before providing you with the data. There is usually no fee for making such a request however, in limited circumstances, we may be able to charge an administrative fee (which will be based on the administrative cost of providing the information).
- g. Obtain and reuse your personal data for your own purposes across different services (right to data portability). This right is only applicable to data that you have provided to us, where we are processing the data based on your consent or for the performance of a contract and when the processing is carried out by automated means. Where this right applies, the data will be provided to you in a structured, commonly used and machine-readable format. As Healthcare Communications are acting solely as a data processor on behalf of the Contracting Authority, we have no right or ownership of this data. All such requests should be made directly to the Contracting Authority.

Our site may, from time to time, contain links to and from the websites of our partner networks, public sector, advertisers and affiliates. If you follow a link to any of these websites, please note that

these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 2.6 Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

## 2.7 Contact and complaints

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [enquiries@healthcomm.uk](mailto:enquiries@healthcomm.uk).

If you have any concerns about the processing of your personal data, we hope that you will contact us in the first instance by contacting our Data Protection Officer:

Data Protection Office: IMImobile Europe Limited, 5 St. John's Lane, Farringdon, London, EC1M 4BH

Email Address: [dpo@imimobile.com](mailto:dpo@imimobile.com)

However, if you wish, you can raise your concerns directly with the Information Commissioner's Office. For details on how to contact the ICO, please go to their website <https://ico.org.uk/concerns/> or call 0303 123 1113.