

222 HEALTHCARE LIMITED

PRIVACY POLICY

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1. **About us and this Privacy Policy**

We are 222 Healthcare Services Ltd, a company incorporated in England and Wales with company number 12582861 and whose registered office is at 2nd Floor Grove House, 55 Lowlands Road, Harrow, HA1 3AW, England (“**we**”, “**us**”, or “**our**”). We are a digital-enabled private GP service offering remote GP services in the United Kingdom and localised in-person services in the Thames Valley area.

This Privacy Policy (and any other documents referred to on it, including our [Cookie Policy](#)) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Our website and services are not intended for children under the age of 16 years old and we do not permit children to open accounts or register with us. However, we do permit children under 16 years of age to use our services where an individual with parental responsibility registers a child in association. In such cases, we reserve the right to make enquiries to satisfy ourselves that such individuals hold appropriate parental responsibility to be able to give clear informed consent for the child concerned. We do not knowingly collect data relating to children under the age of 16 without appropriate consent.

Our website includes links to third-party websites and applications. We do not control these third-party websites and are not responsible for their privacy statements, notices, or policies. When you leave our website, we encourage you to read the privacy notice of every website you visit. We do not accept any responsibility or liability for the privacy policies or notices on third-party websites. Please check these policies before you submit any personal data to such third-party websites.

2. **Data protection principles**

We abide by the following data protection principles, as stipulated in the UK General Data Protection Regulation (UK GDPR), in all of our details with your personal data:

- **Lawfulness, fairness, and transparency.** We will only handle your personal data lawfully, fairly, and in a transparent manner in relation to you.
- **Purpose limitation.** Your personal data will only be collected for specified, explicit, and legitimate purposes (which are explained in further detail below) and not further processed in a manner that is incompatible with those purposes.
- **Data minimisation.** Your personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy.** We will endeavour to keep your personal data accurate and up to date at all times.
- **Storage limitation.** We will retain your personal data for no longer than is necessary for the purposes for which it is used.
- **Integrity and confidentiality.** Your personal data will be handled in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

3. Information we collect about you

We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **CCTV Data**, which refers to closed-circuit television recordings of you attending our premises.
- **Consultation Recording Data**, which means video or audio recordings of consultations that you have with our staff.
- **Contact Data**, which includes email address, billing address, delivery address for testing kits and other products, and telephone number, and emergency contact number.
- **COVID Testing Data**, which includes (for patients requiring COVID-19 testing upon arrival in the UK from an international destination) address of self-isolation, passport number, date of arrival in the UK, and flight details.
- **Financial Data**, which includes payment card details and other financial and billing information.
- **Identity Data**, which includes first name, last name, gender, date of birth, and title.
- **Marketing and Communications Data**, which includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Medical Data**, which includes information about your physical and/or mental health, medical history, symptoms, treatments, medications, surgical or medical procedures undertaken, notes and records of your consultations and conversations with us, and certain 'special category' personal data that we need to know in order to tailor your care (such as genetic and biometric data and information concerning your sexual orientation, religious beliefs, and your racial or ethnic origin).
- **Profile Data**, which includes information about your feedback and survey responses.
- **Technical Data**, which includes your internet protocol (IP) address, cookie identifiers, your 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 our website.
- **Transaction Data**, which includes information such as details of products, tests, and treatments you have purchased from us, payments to and from you, communications with you in respect of your orders, and details of any discounts given.
- **Usage Data**, which includes information about how you use our website and products, such as clickstream to, through, and from our website (including date and time), products 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.

4. How we collect and use your information

We collect personal information from you through your contact and dealings with us (including by phone, email, and remote or face-to-face consultations). We also collect Medical Data from forms you have filled in that you have provided to us and from notes and reports about your health and any treatment and/or care that you have received or need. In addition, we obtain information about you from third parties (for example, your NHS GP or another medical practitioner to whom you have been referred by us and, if you are under 16 years old, from your parent or legal guardian).

Where you provide us with information about other people, you must make sure that they have seen a copy of this Privacy Policy and are comfortable with you giving us their information.

We will only collect and process your personal data where we have a lawful basis to do so. The following table sets out what personal data we collect about you, what we use that personal data for, and our lawful basis for doing so. Please be aware that we process your personal data using more than one lawful basis, depending on the specific purpose or activity.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a patient with 222 Healthcare	(a) Identity (b) Contact	Performance of a contract with you
To deliver medical and other treatment services to you, including by: organising, co-ordinating, and facilitating consultations with medical practitioners; administering the fulfilment and ordering of prescriptions; administrating the delivery of medication, testing kits, and other health products by post or courier; and managing payments, fees and charges in relation to the foregoing	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Medical	(a) Performance of a contract with you (b) Necessary for the purposes of preventative or occupational medicine, medical diagnosis, and the provision of healthcare treatment (c) Necessary for our legitimate interests (for collecting money owed to us) (d) Necessary in order to protect your or another person's vital interests (where the relevant person is incapable of giving consent)
To provide you with COVID-19 testing services, including organising and administering the collection and delivery of COVID-19 testing kits by post or courier and sending completed tests to third-party laboratories for processing and analysis, and managing payments, fees and charges in relation to the foregoing	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Medical (f) COVID Testing	(a) Performance of a contract with you (b) Necessary for the purposes of preventative or occupational medicine, medical diagnosis, and the provision of healthcare treatment
To manage our relationship with you, including handling any complaints or queries and notifying you about changes to this Privacy Policy	(a) Identity (b) Contact (c) Transaction (d) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Transaction (e) Profile	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and in the context of a business reorganisation) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, patient relationships and experiences	(a) Technical (b) Usage (c) Profile	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant and ensure that its content is presented in the most effective manner for you and for your device, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about products or services that may be of interest to you, including by way of email and text message	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Your consent (you can withdraw this at any time by clicking the link to unsubscribe in our marketing emails and/or the relevant 'STOP' number in text messages, or by contacting us using the details above)
To protect us, our customers, and our website from fraud and theft	(a) Identity (b) Contact (c) Financial (d) Transaction (e) CCTV	Necessary for our legitimate interests (for detecting and preventing fraud)
To record your remote consultations with our medical practitioners	(a) Identity (b) Medical (c) Consultation Recordings	Your explicit and informed consent (you can withdraw this at any time by contacting us using the details above)
To share information containing your personal data to the Care Quality Commission or General Medical Council	(a) Identity (b) Medical (c) Consultation Recordings	Necessary for the performance of a task carried out in the public interest. Necessary for compliance with our legal obligations.
To share your personal data with pharmacies that will provide you with prescribed medication, to refer you to	(a) Identity (b) Medical (c) Contact	(a) Performance of a contract with you (b) Necessary for the purposes of preventative or occupational

<p>other clinical or healthcare providers (such as hospitals, specialist clinics, and therapists), and/or to send tests (such as COVID-19 tests) to laboratories for analysis</p>		<p>medicine, medical diagnosis, and the provision of healthcare treatment</p> <p>(c) Necessary in order to protect your or another person's vital interests (where the relevant person is incapable of giving consent)</p>
<p>To share your personal data to people or organisations that we are required to share it with (for example, the Care Quality Commission, the Driving and Vehicle Licensing Agency, the Health Protection Agency, social services, the police, and other law-enforcement and statutory agencies)</p>	<p>(a) Identity (b) Medical (c) Consultation Recordings</p>	<p>(a) Necessary for compliance with our legal obligations</p> <p>(b) Necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health</p> <p>(c) Necessary for the establishment, exercise, or defence of legal claims or whenever courts are acting in their judicial capacity</p>
<p>To share your personal data with social services, the police, and other law-enforcement and statutory agencies in order to safeguard vulnerable individuals</p>	<p>(a) Identity (b) Medical (c) Consultation Recordings (d) CCTV</p>	<p>(a) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>(b) Necessary for the purposes of carrying out the obligations and exercising our specific rights in the field of social protection law</p> <p>(c) Necessary for compliance with our legal obligations</p>
<p>To verify your identity, parental responsibility status, and eligibility regarding certain private prescriptions</p>	<p>(a) Identity (b) Contact (c) Financial</p>	<p>Necessary for compliance with our legal obligations</p>
<p>To review and evaluate the quality of services we provide, including by ensuring that the quality of our live video and audio consultations meet or exceed clinical care standards.</p>	<p>(a) Identity (b) Medical (c) Consultation Recordings (d) Transaction (e) Profile</p>	<p>(a) Necessary for the purposes of preventative or occupational medicine, medical diagnosis, and the provision of healthcare treatment</p> <p>(b) Necessary for our legitimate interests of improving the services and care we provide</p> <p>(c) Your explicit and informed consent (you can withdraw this at any time by contacting us using the details above)</p>

To establish, exercise, or defend legal claims	(a) Identity (b) Medical (c) Consultation Recordings (d) Transaction (e) Financial	Necessary for the establishment, exercise, or defence of legal claims
To record CCTV footage at our premises	CCTV	Our legitimate interests of preventing and detecting crime, safeguarding staff and visitors to our premises, and ensuring compliance with health and safety procedures

Where the lawful basis stated above is your consent, you have the right to withdraw this consent at any time. You can also object to our processing in certain circumstances where our lawful basis for processing is our legitimate interests. Please see section 10 below for further information on how to exercise these rights.

Please note that, where we rely on your consent or our legitimate interests to process your personal data and you withdraw that consent or object to our processing, we may no longer be able to provide certain services to you that are dependent on this processing.

If any of your personal data (such as your Contact Data) changes, please ensure that you let us know as soon as possible so that the information we have about you is kept up to date. You can do this by contacting us using the details provided in section 11 below.

5. Who we share your information with

So that we can provide you with the right level of care, we share your personal information with the following third parties:

- doctors (including your NHS GP), clinicians, therapists, dentists, opticians, osteopaths, chiropractors, pharmacists, diagnostic and treatment centres, and other healthcare professionals (as well as hospitals, pharmacies, clinics, out-of-hours and walk-in centres, and other healthcare providers) so that they can provide treatment and we can monitor the quality of your treatment and care;
- laboratories who process and analyse tests that you have asked us to perform (such as COVID-19 testing) and couriers who deliver and collect testing kits and other products that you purchase from us;
- people or organisations we are required or permitted to share your personal information with by law (for example, the Care Quality Commission, the Driving and Vehicle Licensing Agency, Public Health England, and the Health Protection Agency);
- social services, the police, and/or other law-enforcement or statutory agencies to help them perform their duties or if we have to do this by law or under a court order;
- if you specifically request to have audio or video consultations with us, the relevant platform provider (and, if you request us to record these, which we will only do with your explicit consent, the host provider that stores the relevant video and audio files); and
- if you make payments by telephone, with our third-party payment processors. Otherwise, you pay in person at our premises or via our website, your Financial Data is provided directly to our third-party payment processors who are data controllers in their own right of your Financial Data.

6. How we store your information

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

7. How long we store your information for

We will retain your information for as long as you have an account on our website or are registered with us. If you delete your account or request us to do so (or request to end your registration with us), we will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

In respect of your Medical Data, this is retained in line with the best-practice retention standards set out in the [Records Management Code of Practice for Health and Social Care 2016](#). To determine the appropriate retention period for your other personal data, we consider the amount, nature and sensitivity of that information, the potential risk of harm from unauthorised use or disclosure of that information, the purposes for which we process it, and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

In some circumstances we will fully anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes (for example, so that we can analyse trends such as the number of consultations we undertake each month). In these circumstances, we may use this information indefinitely without further notice to you.

8. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

For further information on cookies (including about how we use them and when we will request your consent before placing them and how to disable them), please see our [Cookie Policy](#).

9. International transfers of your information

Our website is hosted on servers in Germany by an ISO 27001-accredited organisation. Only your Identity, Contact, Profile, Technical, and Usage Data will be stored on those servers. Germany has been deemed to provide an adequate level of protection of your personal data under the UK's adequacy regulations issued under the Data Protection Act 2018.

Otherwise, we do not transfer any of your personal data (including any of your Medical Data and Consultations Recording Data) outside of the United Kingdom.

10. Your rights

Under applicable data protection laws, you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal information (including your Medical Data) and to certain other supplementary information that this Privacy Policy is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us (and where the relevant lawful basis stated in section 4 above is your consent or our performance of a contract with you), in a structured, commonly used, and machine-readable format and have the right to transmit those data to a third party in certain situations (please note that this right does not apply to personal data contained only in hard-copy records);
- withdraw your consent (if you have given this to us previously) for us to contact you for direct marketing purposes;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object to your medical records that we hold being shared with specific individuals or organisations (subject to our legal and regulatory obligations);
- object in certain other situations to our continued processing of your personal information; and
- otherwise restrict our processing of your personal information in certain circumstances.

If you would like to exercise any of those rights, please contact us using the details provided in section 11 below, letting us know the information to which your request relates.

We will typically 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. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests (in which case we will notify you and keep you updated).

We hope that we can resolve any query or concern you raise about our use of your information. You have the right to make a complaint at any time to the supervisory authority in the United Kingdom for data protection issues, the Information Commissioner's Office (ICO), whose website is at www.ico.org.uk. We would, however, appreciate the opportunity to deal directly

with your concerns before you approach the ICO, and would be pleased to respond to any such complaints as your first-priority contact.

11. How to contact us

Any questions or requests regarding this Privacy Policy, including any requests in respect to your personal data that we process, may be sent by post to the above-stated address marked for the attention of our Data Protection Lead, or emailed to our us at support@222healthcare.co.uk. You can also write to us by post using the following address: 222 Healthcare Services Ltd, Stokenchurch Medical centre, Stokenchurch, High Wycombe, HP14 3SX.

12. Updates to this Privacy Policy

This Privacy Policy was last updated on 19 April 2021.

We may amend this Privacy Policy from time to time as necessary to comply with law or for legitimate business purposes. Any changes we make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this Privacy Policy.