

GDPR Statement & Privacy

(v1.7 – 08/06/2023)

CONTEXT Health wish to inform you that, due to the new data protection regulation that will be directly applicable in the European Union as of 25th May 2018, we've updated our Privacy Policy to make it easier for you to understand the information we collect and why we collect it.

Please rest assured we do not as a business 'sell on' or pass to 'third parties' data we hold on you.

- We won't be changing the way in which we hold your data, as typically we only hold your 'Business name', 'Address', 'Telephone number' and 'email' details on our database for you our client.
- We retain all data from previous communications on our server and if you wish for this to be removed please let us know and we can delete if required.
- We do not collect information from our website on our customers.
- We do not collect any personal (non-business related) details on individuals whatsoever.

We are a data processor and therefore any data is collected by the clinician users of the system rather than the system itself.

The Context Meeting application is a communications platform used by clinicians. The onus is on the clinician to ensure that patient data used/stored on the Context Meeting platform will have been pre-authorised during prior patient / clinician consultations.

As long as you do not object or withdraw your consent, we will assume that you are happy to continue to receive CONTEXT Health emails and other communication means as the case may be, as outlined in our Privacy Policy which will take effect on May 25, 2018.

Any personal information provided to us will be held securely. We will not share your data without your specific consent. We will endeavour to ensure that your personal information is maintained and updated correctly. It is your duty to inform us of any changes to your personal information to ensure that it is up to date. We do not collect personal information on individuals under the age of 16. We will retain any records captured to assist you in possible future collaboration with CONTEXT Health. If you do not want us to retain your information, wish to know what information we keep of yours, or want to request that we delete or amend information from our database, please contact us directly.

As set out in the Data Protection Act and General Data Protection Regulation (GDPR), you have the right to request a copy of the personal information we hold about you and to correct any inaccuracies. As part of our business, we will require certain information from clients in order to provide appropriate services.

Context Health will only collect the minimum levels of personal data necessary to support our operational processes and will only use your personal data as described within this policy.

We will not seek sensitive personal information unless it is legally required or reasonably necessary to maintain a professional relationship. Sensitive information includes data concerning race or ethnic origin, physical or mental health, sexual orientation, religious beliefs, political opinion, trade union membership or criminal records and proceedings.

If you are an associate of CONTEXT Health, we may use your personal information, including (but not limited to) your name, address, telephone numbers, email addresses, bank details, passport information and CV details for the following lawful purposes:

- Matching your details with appropriate assignments
- Contacting you by telephone, email or post to alert you to identify availability and suitability and make any logistical arrangements
- Supplying your details to prospective clients prior to any assignments
- Obtaining references from your named referees; if required to support your assignment prospects

If you would like to find out more about the legal basis for which we process personal information please contact our DPO: Sarah Smart by e-mail at support@contexthealth.com

Your individual rights as a data subject

Under the UK GDPR you have certain rights regarding the data which we gather and hold about you.

Right to be Informed

Individuals have the right to be informed about the collection and use of their personal data.

This Privacy Policy provides the information you need to understand our approach to managing personal data. The policy sets out:

- Why we need to access your personal data?
- How long we will hold that data after your interaction with Context Health has completed?
- Who we share your data with?
- Where we store your data?

Right of access

You have the right at any time to ask for a copy of the information that Context Health holds about you, and Context Health will supply that data to you in line with its legal requirements to do so.

To request access to your data please place your request in an email to support@contexthealth.com quoting 'Right of Access' in the email header.

Right to rectification

If any information that Context Health holds about you is wrong, you have the right to ask us to make the necessary corrections.

To request amendments to your data please place your request in an email to support@contexthealth.com quoting 'Right to Rectification' in the email header.

Right to erasure

You have the right to ask Context Health to remove all personal data we hold about you from our systems.

To request that your personal data is securely deleted from our records, please place your request in an email to **support@contexthealth.com** quoting 'Right to Erasure' in the email header.

Right to restrict processing

You have the right to request that your data is not used for specific forms of processing that Context Health undertakes.

To request limits to be placed on how your data is processed by the Context Health team, please place your request in an email to **support@contexthealth.com** quoting 'Right to Restrict Processing' in the email header.

Right to data portability

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.

The data that Context Health holds about you can be delivered directly to you, or to external organisations you grant permission to, in a variety of electronic formats depending on your request. This data will only be delivered when a written request is received from a validated user.

To request that your data can be shared/transferred to another system external to Context Health, by the Context Health team, please place your request in an email to **support@contexthealth.com** quoting 'Right to Data Portability' in the email header.

Right to object

The UK GDPR gives individuals the right to object to the processing of their personal data in certain circumstances.

To request that your data is not processed under certain circumstances, please place your request in an email to **support@contexthealth.com** quoting 'Right to Object' in the email header. It is important to understand that certain types of processing are essential to ensure that Context Health can deliver its services and requesting to be excluded from these processing tasks may limit your ability to access all of the functionality provided by the Context Health platforms.

Right to withdraw consent

Where we rely on your consent to process your personal information, you have the right to withdraw that consent at any time.

Consent preference can be changed through accessing the User Profile page at any time.

Alternatively, you can email **support@contexthealth.com** to request that your consent is withdrawn. Please use 'Consent Management' in the header of the email you send for this purpose.

Rights related to automated decision making, including profiling

The UK GDPR has provisions on:

- automated individual decision-making (e.g. making a decision solely by automated means without any human involvement)
- profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process

Please inform us if you do not want your data to be used in this way.

The Context Health team will acknowledge all requests as soon as possible, and aims to address any queries you may have within 7 working days. However, under UK GDPR we have up to 30 days to respond to requests.

Retention of your personal data

Context Health will retain any personal data it captures for the duration of a registered relationship with the data subject. Once this formal, contractual relationship has ended Context Health will maintain the personal data for a period of 2 years to support any operational management, or legal requirements that may arise. After this period, Context Health converts any personally identifiable data into anonymous data and the personally identifiable elements of the stored data is destroyed using best practice data deletion standards.

How to complain

If you have any complaint about the use of your personal data please contact: [**support@contexthealth.com**](mailto:support@contexthealth.com)

If you remain dissatisfied you can also complain to the Information Commissioner's Office about how we have used your data. The ICO's address is:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

ICO Helpline number: 0303 123 1113.

Under 18-year-olds

For users who are 18 or under, a parent/guardian's permission is required before any personal information is captured relating to the individual.

If you have any knowledge of a child accessing the app and providing personal data, without parental consent you can report to Context Health at: [**support@contexthealth.com**](mailto:support@contexthealth.com)

Our use of cookies

Cookies are small text markers stored on your computer that enable us to understand how people use our website.

No personally identifiable information is stored in cookies. In common with many similar websites, Context Health uses them to help remember preferences and for anonymous statistical measurements – for example so we know how many “visits” a page has had.

Context Health uses cookies to:

- remember certain information about users so they don't have to repeatedly provide that information
- recognise if users are already logged in to certain areas of the website
- measure how people use our website so we can continually improve how information is provided.

You can control and delete cookies

Even though Context Health does not use cookies to collect personally identifiable information about you, you might still want to restrict or block cookies.

You can do this through your chosen internet browser (Internet Explorer, Google Chrome, Mozilla Firefox etc.). Use the help function within the specific browser to find out how.

However, if you restrict cookies for the Context Health website or Context Meeting platform then there is a risk you will not be able to access the full functionality of the Context Health website or Context Meeting platform and your user experience may be undermined as a result.

What cookies are used on Context Health websites and platforms?

The cookies applied on Context Health websites and Context Meeting platform are:

- Google Analytics – This is a service we use from Google that collects information about how people use our website. We use this to make sure we are providing the best service we can to our web visitors. This information cannot be used to identify you and is only available for Context Health's internal use. Context Health does not allow Google to share it. Using cookies, Google Analytics captures information that allows Context Health to understand:
 - What pages were viewed
 - How long those pages were viewed for
 - How the user came to the site
 - What website buttons and functions were clicked on
 - What browser was used to access the site
 - What country the computer is accessing the site from
 - What search terms were used
- Third-party cookies – Some of our pages may have a "Share this" function that allows you to share content with your friends or colleagues via email, Twitter, Facebook etc. Context Health uses cookies to make this service work. It provides information on what items a site user has shared, how many people are sharing and how many page "views" the Context Health site has received as a result of the sharing. As above, this data does not include information that is capable of personally identifying a Context Health user.
- Cookies that are set by other websites – If you are using the sharing facility already mentioned (i.e. Share content with Facebook, Twitter) then it is possible those websites (i.e. Facebook) may also set cookies when you log in to their service. Context Health is not responsible for third party cookies of this nature and does not control these cookies.

- Embedded third party services – Occasionally we embed things like video, audio and pictures from other websites such as YouTube, Vimeo, Flickr or Soundcloud. This means it looks like one of our web pages, but the video is being fed through from another site (e.g., YouTube). When this embedded content is accessed via the Context Health site, the owner of that site may use their own cookies to record that you watched or viewed the content. Context Health has no control over these cookies so you should check the relevant website for more information.

Changes to your personal details

If your personal details change, please help the Context Health team to keep those details up to date by telling us about any changes.

If you want to see what information we have about you, or need to tell us about any changes to the information that you have given to us, please contact:

Context Health Ltd,

The Old Chapel Business Centre,

33 Church Street,

CO6 1TX

Email: support@contexthealth.com

Privacy Policy

This Privacy Policy ("Policy") explains how information about you is collected, used, and disclosed by your access or use of this Site, web/mobile application or otherwise as a result of your interactions with Context Health. By visiting this site directly or through another site, you accept the terms and conditions of this Policy. This Policy applies to this site. We are not responsible for the content or privacy practices on any website not operated by Context Health to which this site links or that links to this site.

Information Collection

We collect information from you in several different ways on this site.

Registration

Before using certain portions of our website, web application or mobile app you may be required to complete an online registration form. During registration, you will be asked to provide to us certain personal information, including but not limited to your name, phone number, email address. In addition, we may also ask you for your country of residence and/or your organisation's country of operation, so we can comply with applicable laws and regulations.

Information We Collect Automatically

We may also automatically collect information about you when you access or use the Site or transact business with us, including:

Log Information: We obtain information about your use of our websites, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to this Site.

Device Information: We collect information about the computer or mobile device you use to access Our Services, such as the hardware model, operating system and version, unique device identifiers, mobile network information, and browsing behaviour.

Location Information: We may collect information about the precise location of your device when you consent to the collection of this information. We may also collect information about your approximate location each time you access this Site.

Information Collected by Cookies and other Tracking Technologies: We may use cookies, web beacons, and other tracking technologies to collect information about you and your interaction with this Site, including information about your browsing behaviour and other engagement with the Services. We use this information in one or more of the ways described in the "Use of Information" section below. Most web browsers are set to accept cookies by default, but you can usually change your browser settings to remove or reject cookies.

Information We Collect from Other Sources

We may also receive information about you from other sources and combine or link that with information We have about you. For example, we may collect demographic and change-of-address information from third party sources and information from third party social media platforms (such as Facebook) if you log into this Site using your social media account credentials or if you make certain content and information publicly available, such as photos, videos, and profile information.

Third Party Links

The policy does not extend to third parties and users are advised to make themselves aware of the privacy policies of any third-party site or platform that they visit via our website, desktop application or mobile app.

Information Use and Disclosure

Internal Use

We use your personal information to provide you with customer service only.

Communications with You

We will use your personal information to communicate with you about this site. We will send you a confirmation email when you register with us. We may send you a service-related announcement on the rare occasions when it is necessary (for example, if we must temporarily suspend our service for maintenance). We always permit you to unsubscribe or opt out of future emails.

External Use

We do not use user data for the purpose of marketing in any form.

Except as otherwise set forth below, we do not sell, rent, trade, license or otherwise disclose your specific personal information or financial information to anyone.

We may disclose information to third parties that perform specific functions on Our behalf. However, we will only disclose the information that is necessary for them to perform their service.

We may disclose personal information in response to requests from law enforcement officials conducting investigations; subpoenas; a court order; or if we are otherwise required to disclose such information by law. We also will release personal information where disclosure is necessary to protect our legal rights, enforce our Terms and Conditions or other agreements, or to protect ourselves or others. For example, we may share information to reduce the risk of fraud or if someone uses or attempts to use this Site for illegal reasons or to commit fraud.

While we will not sell (or trade or rent) personally identifiable information to other companies as part of our regular course of business. However, it's possible that we might acquire or merge with or be acquired by another company or that we might dispose of some or all of Our assets. If that happens, your personal information may be disclosed to another company, but that disclosure will be subject to the Privacy Policy in effect.

Data Security

We use Microsoft Azure to securely store your data. Azure Storage protects your data by automatically encrypting it before persisting it to the cloud. We take all reasonable measures, including administrative, technical, and physical safeguards, to protect information about you from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction.

Opt-Out/Corrections

Upon your request, we will (a) correct or update your personal information; (b) stop sending emails to your email address; and/or (c) disable your account to prevent any future purchases through that account. You can make these requests by emailing us support@contexthealth.com

Please do not email your credit-card number or other sensitive information.

Offline Collection Use and Disclosure

We also may collect information offline. We will treat any information collected offline in a manner that is consistent with this Policy. One example involves someone calling Us to place an order or to ask questions. When someone calls, we will ask only for the personal information We need in order to place the booking or to answer the question. When We need to store information (such as order information), We will enter it into our database.

Updates to this Policy

If we change or update this Privacy Policy, we will post changes and updates on the Site so that you will always be aware of what information we collect, use and disclose. We encourage you to review this Policy from time to time so you will know if the Privacy Policy has been changed or updated.

Should the purpose of data collection change this policy will be updated and we will duly re-obtain your consent.

If you have any questions about the Policy, please contact us at support@contexthealth.com.