

# Our Website Privacy Policy

## INTRODUCTION

Welcome to The Doctors Clinic Group's website privacy notice.

The Doctors Clinic Group respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

The Doctors Clinic Group is a subsidiary of Spire Healthcare Group PLC. This privacy policy describes our practices regarding business and personal account information collected through our website (<https://www.londondoctorsclinic.co.uk/>). It is important, so that you are fully aware of how and why we are using your data, that you read this website privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you for particular purposes. For instance:

- If you are a patient of The Doctors Clinic Group, details of how we collect and use information about you as a patient can be found in our patient's privacy policy.

This website privacy notice supplements these other notices and is not intended to override them.

The Doctors Clinic Group is committed to safeguarding the privacy of our website visitors and this policy sets out how we will treat your personal information. Our policy complies with UK law accordingly implanted including that required by the EU General Data Protection Regulation (GDPR).

If you are a patient of the Doctors Clinic Group, details of how we collect and use information about you as a patient can be found in our patient's privacy notice.

## PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how The Doctors Clinic Group collects and processes your personal data through your use of this website [including any data you may provide through this website].

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you for particular purposes so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

This website is not intended for children, and we do not knowingly collect data relating to children.

## CONTROLLER

The Doctors Clinic Group Limited is the controller and responsible for your personal data (referred to as 'The Doctors Clinic Group', 'we', 'us' or 'our' in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## CONTACT DETAILS

Our full details are:

Full name of legal entity: The Doctors Clinic Group Limited which is a company registered in England and Wales under the company number 08841773 and whose registered address is 3 Dorset Rise, London EC4Y 8EN

DPO email address: [dpo@londonDoctorsclinic.co.uk](mailto:dpo@londonDoctorsclinic.co.uk)

Postal Address: Bank Chambers, 6 – 10 Borough High Street, London. SE1 9QQ

Telephone number: 020 718 30553

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in December 2022. Historic versions can be obtained by contacting us at [dpo@londonDoctorsclinic.co.uk](mailto:dpo@londonDoctorsclinic.co.uk).

We reserve the right to update this privacy statement at any time, and we provide you with a new privacy statement when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

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.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

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).

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

- Identity data includes first name, last name, title, date of birth, gender and your occupation

- Contact Data includes postal address, email address and telephone numbers
- Financial Data includes bank account and payment card details
- Transaction data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, 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 this website.
- Profile data includes your username and password, purchases or orders made by you, your preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.

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 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 notice.

We do not collect any Special Categories of Personal Data about you in relation to your use of our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions or offences. However, where we collect or process personal data about you for other purposes, for instance if you are a patient of The Doctors Clinic Group, we may process Special Categories of Personal Data about you for those purposes – this will be detailed in the separate privacy notice relating to our use of data about you for those purposes.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

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 and 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.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

1. Direct interactions. You may give us your identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Make an appointment to use our products or services.
  - Complete a survey; or
  - Give us some feedback

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://www.londonDoctorsclinic.co.uk/terms-conditions> for further details.

Third parties or publicly available sources. We receive the following data from third parties set out below, however this does not fall under person data:

- Technical Data:
  - a) Although this is aggregated non-personal data, Google, based outside the EU, provide us with:
    - Network location (city of origin)
    - Time of visit, pages visited, and time spent on each page of the webpages
    - Referring site details (such as the URI a user came through to arrive at this site)
    - Type of web browser
    - Type of operating system (OS)
    - Flash version, JavaScript support, screen resolution and screen colour processing ability
    - Transactions
    - Sessions
    - Clicks on links leading to external websites
    - Errors when users fill out forms
    - Scroll depth
    - Interactions with site-specific widgets

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Performance of a contract: Where we need to perform the contract, you are about to enter into or have entered into either with us or with a third party (such as your employer).
- Legitimate interests: Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Legal Obligation: Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email, mail or text message or other channels from time to time. You have the right to withdraw consent to marketing at any time by contacting us at [optout@londonDoctorsclinic.co.uk](mailto:optout@londonDoctorsclinic.co.uk)

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that 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 at [dpo@londonDoctorsclinic.co.uk](mailto:dpo@londonDoctorsclinic.co.uk) 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 in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	Performance of a contract
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Performance of a contract (b) Necessary for our legitimate interests (to recover debts due to us)

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(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 or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

## PROMOTIONAL MATERIAL FROM US

You will receive marketing communications from us if you have purchased goods or services from us and, in each case, you have not opted out of receiving that marketing,

## THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside of The Doctors Clinic Group for marketing purposes.

## OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at [optout@londondoctorsclinic.co.uk](mailto:optout@londondoctorsclinic.co.uk) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data processed by us as a result of your use of our products/services or other transactions.

## COOKIES

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 website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.londondoctorsclinic.co.uk/terms-conditions/>.

## CHANGE OF PURPOSE

We will only use your 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 not 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 at [dpo@londondoctorsclinic.co.uk](mailto:dpo@londondoctorsclinic.co.uk).

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

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Service providers who fulfil an essential part of the services we provide to you e.g. laboratories, imaging centres or other specialist consultants.
- Professional advisers including lawyers, auditors and insurers who provide consultancy, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

In addition, we may share your personal data with properly authorised employees within Carbon where it is necessary to meet our legal/regulatory obligations or is otherwise necessary for our legitimate interests including our clinical governance, audit or IT security requirements.

## 6. INTERNATIONAL TRANSFERS

We work with international medical assistance providers and travel insurers who refer patients to us who need to see a doctor while in London. These patients sign a consent form to have data passed back to the Medical Assistance Provider/insurer. NB These patients are usually not UK residents.

For patients who are not referred to us by a medical assistance provider, we will not transfer data outside of the EEA.

Many of our external third parties are based outside the European Economic Area [EEA] so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the privacy shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us at [dpo@londonDoctorsclinic.co.uk](mailto:dpo@londonDoctorsclinic.co.uk) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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.

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 unauthorized use or disclosure of your 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us at [dpo@londonDoctorsclinic.co.uk](mailto:dpo@londonDoctorsclinic.co.uk)

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information.

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.

## 8. YOUR LEGAL RIGHTS

Under certain circumstances by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction or processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [dpo@londondoctorsclinic.co.uk](mailto:dpo@londondoctorsclinic.co.uk)

### 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 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 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.

## 9. GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. 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 at [dpo@londonDoctorsclinic.co.uk](mailto:dpo@londonDoctorsclinic.co.uk)

**Performance of a Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.