

Ultracardiac Ltd Privacy Policy

Version 1.0 (2-Oct-18)

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Privacy Policy

Effective as of 25th May 2018. This Privacy Policy was last updated on 18th September 2018

Introduction

Ultracardiac Ltd (the “data processor”) takes the privacy of your personal data very seriously and is committed to safeguarding your privacy and your personal data, complying with the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003. This Privacy Policy relates to our use of any personal data we collect from you directly, or indirectly via 3rd party data providers, covering individuals who:

- use our products and services;
- contact us concerning our products and services;
- supply products or services to Ultracardiac Ltd;
- have applied to work for Ultracardiac Ltd, or are current or former employees of Ultracardiac Ltd.

This Privacy Policy will explain the following:

- what personal data may be collected about you;
- how Ultracardiac Ltd will use this personal data;
- how long will you retain my personal data;
- how this personal data may be shared with other parties;
- how your personal data will be kept secure;
- your rights regarding the personal data you provide to us;
- how to contact us.

In this policy, personal data means data relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, and online identifier or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural or social identity.

Ultracardiac Ltd encourages you to review the privacy statements of websites you choose to link to from Ultracardiac Ltd so that you can understand how those websites collect, use and share your information. Ultracardiac Ltd is not responsible for the privacy statements or other content on websites outside of the Ultracardiac Ltd website.

What personal data is held about you and how we use it?

a) Information that you provide to us

1. Users of our product and services

Ultracardiac Ltd collects personal data from you when you use our products or services, including name, e-mail address, postal address, telephone number, hospital number / personal reference number, GP details, clinical history / reason for referral

We will use this personal data:

- To carry out obligations arising from being a registered user of our product and services. The lawful basis for processing your personal data for this purpose will be "Contractual Need".

2. Individuals contacting us concerning our products and services

Ultracardiac Ltd collects personal data from you when you contact us about our products or services, including name, address, telephone number and email address.

We will use this personal data:

- To respond to your query. The lawful basis for processing your personal data for this purpose will be "Legitimate Interest"

3. Companies who supply products or services to Ultracardiac Ltd

Ultracardiac Ltd collects personal data from you when you supply products or services to Ultracardiac Ltd, including name, email address, postal address, telephone number, job title, bank details.

We will use this personal data:

- To carry out obligations arising from you providing us products or services. The lawful basis for processing your personal data for this purpose will be "Contractual Need".

4. Individuals who have applied to work for Ultracardiac Ltd

Ultracardiac Ltd collects personal data from you when you apply to work for Ultracardiac Ltd including name, email address, postal address, telephone number, date of birth, qualifications, employment history, education history and details of referees.

We will use this personal data:

- To complete the interview process we will use your personal data to communicate with you, complete background checks where permitted by law and manage your application through the interview selection process. The lawful basis for processing your personal data for this purpose will be "Contractual Need".

5. Individuals who are current or former employees of Ultracardiac Ltd

Ultracardiac Ltd collects personal data from you when you work for Ultracardiac Ltd including name, email address, postal address, telephone number, date of birth, employee identification number, bank details, national insurance number and emergency contact details.

We will use this personal data :

- To enable us to employ, pay and manage your work. The lawful basis for processing your personal data for this purpose will be “Contractual Need”.
- In case of emergencies when will utilise your emergency contact details. The lawful basis for processing your personal data for this purpose will be in the employees “Vital Interests”.
- To comply with applicable tax, employment and health & safety laws. The lawful basis for processing your personal data for this purpose will be “Compliance with Legal Obligations”.

b) Data provided to us by 3rd parties

Ultracardiac Ltd collects personal data about you from referring 3rd parties – NHS Hospital Trusts; private hospitals; private consultant cardiologists; and GPs, to include name, address, telephone number, date of birth, hospital number / personal reference number, referring clinician, clinical history, reason for referral, GP details

- We use the personal data to carry out obligations arising from being a registered user of our product and services. The lawful basis for processing your personal data for this purpose will be “Contractual Need”.

How long will you retain my personal data?

We will retain and process your personal data as long as is needed to provide the products and services you are using, or to comply with our legal obligations.

All patient personal data held by Ultracardiac Ltd is deleted with 10 working days of the echocardiogram having been carried out.

All patient personal data held by Ultracardiac Ltd where an echocardiogram has not been carried out (ie patient did not arrive for appointment / referred back to requesting clinician) is stored under password protection for 6 months, then deleted.

Scheduled repeat appointments – data held until treatment has concluded, then deleted within 10 working days.

Echocardiogram report and images are held on Ultralingq for 7 years from the echocardiogram having been carried out

How will my personal data be shared?

We share information, including personal data, with our third-party service providers, that we use to provide hosting for and maintenance of our websites, payment processing, accounts, and other services for us. We do not permit our third-party service providers to use the personal data, that we share with them, for their marketing purposes or for any other purpose than in connection with the services they provide to us.

To facilitate these services the personal data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), in order to conduct our business operations. In such cases a data processing agreement will be in place with the data processors and 3rd parties to ensure your personal data is processed in accordance with the Data Protection Act.

Ultracardiac Ltd does not sell, rent or lease its personal data to third parties.

Ultracardiac Ltd will in certain circumstance disclose your personal data, if required to do so by law or in the good faith belief that such action is necessary to:

- a) conform to the edicts of the law or comply with legal process served on Ultracardiac Ltd;
- b) protect and defend the rights or property of Ultracardiac Ltd; and,
- c) act under exigent circumstances to protect the personal safety of users of Ultracardiac Ltd, or the public.

How is my personal data kept secure?

Ultracardiac Ltd is committed to protecting the security of your personal data. We will use a variety of security technologies and procedures to protect your personal data from unauthorised access, use or disclosure.

All patient personal data and referral information is stored on a secure cloud based server under password protection.

Paper copies of the referral are used by the echocardiographer for the purposes of the scan. These are disposed of in our locked confidential waste at the close of business each day. Our confidential waste is destroyed by Devon Contract Waste.

What are my choices with my personal data?

Ultracardiac Ltd is committed to providing you with control on how your data is used and processed. You can review, edit or delete your personal data free of charge by contacting us directly at info@ultracardiac.co.uk, by telephone or via postal communication to the contact details provided in the section "Contact Us".

Your rights concerning your personal data are:

- you can ask about the personal data we hold about you and we will show you, free of charge;
- you can request your personal data is corrected and we will update the details and inform you when completed, free of charge;
- you can object to your data being processed and we will stop processing your data once no longer required for performance of contract or legal obligations, free of charge;
- you can ask for your personal data to be erased, once no longer required for performance of contract or legal obligations, which we will erase completely, free of charge.

Your right to lodge a complaint with ICO

You have the right to lodge a complaint with the Information Commissioner Office (www.ico.org.uk)

Changes to this Policy

Ultracardiac Ltd will occasionally update this Privacy Policy to reflect company and customer feedback. Ultracardiac Ltd encourages you to periodically review this policy to be informed of how Ultracardiac Ltd is protecting your information.

Contact Us

Ultracardiac Ltd welcomes your comments regarding this Privacy Policy or about Ultracardiac Ltd's privacy practices, please contact us by email at info@ultracardiac.co.uk or telephone at: 01752 875665, or at:

Ultracardiac Ltd

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