

# PRIVACY POLICY

## Data controller is:

The MEDIKA Clinic Management,  
No1 Spinningfields,  
1 Hardman Square,  
Manchester  
M3 3EB

marketing@medika.health

Phone: +44 (0) 161 394 1559

Thank you for visiting our website. Protection of your privacy is very important to us. Below you will find extensive information about how we handle your data.

## 1. Access data and hosting

You may visit our website without revealing any personal information. With every visit on the website, the web server stores automatically only a so-called server log file which contains e.g. the name of the requested file, your IP address, the date and time of the request, the volume of data transferred and the requesting provider (access data), and documents the request.

These access data are analysed exclusively for the purpose of ensuring the smooth operation of the website and improving our online appearance. This serves according to Art. 6 (1) (f) GDPR the protection of our legitimate interests in the proper presentation of our online appearance that are overriding in the process of balancing of interests. All access data are deleted no later than seven days after the end of your visit on our website.

## 2. Data processing for establishing contact

We collect personal data if you voluntarily provide it when contacting us (e.g. via contact form or e-mail). Mandatory fields are marked as such because in these cases we absolutely need the data to process your contact request and you cannot send the request without providing it. Which data is collected can be seen from the respective input forms. We use the data you provide to process your enquiries in accordance with Art. 6 (1) (b) GDPR. After complete processing of your enquiry, your data will be deleted unless you have expressly consented to further use of your data. 6 (1) (a) GDPR or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this privacy policy.

### 3. Advertising via e-mail

#### 3.1 E-mail advertising upon subscription to the newsletter

If you subscribe to our newsletter, we will regularly send you our email newsletter based on your consent according to Art. 6 (1) (a) GDPR, using the data required or disclosed by you separately for this purpose.

You may unsubscribe from the newsletter service at any time. For this purpose you can either send a message to the contact option specified below or use the opt-out link in the newsletter.

After unsubscribing, we will delete your e-mail address from the list of recipients, unless you have expressly consented to the further use of your data. 6 (1) (a) GDPR or we have reserved the right to use your data for other purposes that are permitted by law and about which we inform you in this privacy policy.

#### 3.2 Newsletter mailing

The newsletter is sent to you by our service provider who processes data on our behalf and to whom we disclose your email address. If you have any questions about our service providers and the basis of our cooperation with them, please use the contact option described in this privacy policy.

### 4. Cookies and further technologies

## 4.1 General information

In order to make visiting our website attractive and to enable the use of certain functions, to display suitable products or for market research, we use technologies on various pages, including so-called cookies. Cookies are small text files that are automatically stored on your end device. Some of the cookies we use are deleted after the end of the browser session, i.e. after closing your browser (so-called session cookies). Other cookies remain on your end device and enable us to recognise your browser during your next visit (persistent cookies).

We use such technologies that are strictly necessary for the use of certain functions of our website (e.g. enabling website preferences). These technologies are used to collect and process IP addresses, time of visit, device and browser information as well as information on your use of our website (e.g. website preferences). 6 (1) (f) GDPR that are overriding within the frame of balancing of interests.

In addition, we use technologies to fulfil the legal obligations, which we are subject to (e.g. to be able to prove consent to the processing of your personal data) as well as for web analysis and online marketing. Further information on this, including the respective legal basis for data processing, can be found in the following sections of this privacy policy.

You can find the cookies settings for your browser by clicking on the following links: [Microsoft Edge™](#) / [Safari™](#) / [Chrome™](#) / [Firefox™](#) / [Opera™](#)

If you have consented to the use of the technologies. 6 (1) (a) GDPR, you can withdraw your consent at any time by sending a message to the contact option described in the privacy policy. Alternatively, you can also click on the following link: [www.medika.health](http://www.medika.health). If cookies are not accepted, the functionality of our website may be limited.

## 5. Use of cookies and other technologies for web analytics and advertising purposes

If you have given your consent in accordance with Art. 6 (1) (a) GDPR, we use the following cookies and other third-party technologies on our website. The data collected in this context will be deleted after the relevant purpose has been fulfilled and we have ended the use of the respective technology. You can withdraw your consent at any time with effect for the future. Further information on your withdrawal options can be found in the section “cookies and further technologies”. Further information, including the basis of our cooperation with the service providers can be found within the respective technologies. If you have any questions about our service providers and the basis of our cooperation with

them, please use the contact option described in this privacy policy.

## 5.1 Use of Google services

We use the following technologies of Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland (“Google”). The information automatically collected by Google technologies about your use of our website is usually transferred to a server of Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA and stored there. There is no adequacy decision with respect to the USA by the European Commission. Our cooperation is based on standard data protection clauses adopted by the European Commission. If your IP address is collected using Google technologies, it will be shortened by activating IP anonymisation before being stored on Google’s servers. Only in exceptional cases will the full IP address be transferred to a Google server and shortened there. Unless otherwise specified for the specific technologies, data processing is based on an agreement concluded for the respective technology between jointly responsible parties in accordance with Art. 26 GDPR. Further information about data processing by Google can be found in [Google’s privacy policy](#).

### Google Analytics

For the purpose of website analytics, Google Analytics automatically collects and stores data (IP address, time of visit, device and browser information as well as information on your use of our website), from which usage profiles are created using pseudonyms. Cookies can be used for this purpose. Your IP address will not be merged with other data from Google. The data processing is based on a data processing agreement with Google.

### Google Ads

For advertising purposes in the Google search results as well as on the websites of third parties, the so-called Google **Remarketing** Cookie is used when you visit our website, which automatically enables interest-based advertising through the collection and processing of data (IP address, time of visit, device and browser information as well as information on your use of our website), by means of a pseudonymous cookie ID and on the basis of the pages you visit. Any further data processing only takes place if you have activated the setting “personalised advertising” in your Google account. In this case, if you are logged into Google while visiting our website, Google will use your data together with Google Analytics data to create and define target group lists for cross-device remarketing.

For website analysis and event tracking, we use Google Ads **Conversion Tracking** to measure your subsequent usage behavior when you arrive on our website via a Google Ads ad. For this purpose, cookies may be used and data (IP address, time of visit, device and browser information as well as information on your use of our website based on events specified by us, such as a visit to a website or newsletter registration) may be collected, from which usage profiles are created using pseudonyms.

### Google Maps

For the visual representation of geographical information, Google Maps collects data on your use of the Maps functions, in particular the IP address and location data, and transmits this data to Google and then processes it by Google. We have no influence on this subsequent data processing.

### **Google reCAPTCHA**

For the purpose of protection against misuse of our web forms as well as against spam by automated software (so-called bots), Google reCAPTCHA collects data (IP address, time of visit, browser information as well as information on your use of our website) and performs an analysis of your use of our website by means of a so-called JavaScript and cookies. In addition, other cookies stored in your browser by Google services are evaluated. Personal data is not read out or stored from the input fields of the respective form.

### **YouTube Video Plugin**

In order to integrate third party content, data (IP address, time of visit, device and browser information) are collected via the YouTube Video Plugin in the expanded data protection mode used by us, transmitted to Google and then processed by Google only when you play a video.

## **5.2 Use of Facebook services**

### **Use of Facebook Pixel**

We use the Facebook pixel within the framework of the technologies of Facebook Ireland Ltd, 4 Grand Canal Square, Dublin 2, Ireland (hereafter “Facebook”) as described below. The Facebook pixel is used to automatically collect and store data (IP address, time of visit, device and browser information as well as information on your use of our website based on events specified by us, such as a visit to a website or newsletter registration), from which user profiles are created using pseudonyms. For this purpose, a cookie is automatically set by the Facebook pixel when you visit our website, which automatically enables recognition of your browser when visiting other websites by means of a pseudonymous cookie ID. Facebook will combine this information with other data from your Facebook account and use it to compile reports on website activities and to provide other services associated with website use, in particular personalised and group-based advertising. We have no influence on data processing by Facebook and only receive statistics based on Facebook pixels.

The information automatically collected by Facebook technologies about your use of our website is usually transferred to a server of Facebook, Inc. 1601 Willow Road, Menlo Park, California 94025, USA and stored there. There is no adequacy decision for the United States by the European Commission. If the data transfer to the USA falls within the scope of our responsibility, our cooperation is based on standard data protection clauses of the European Commission. Further information about data processing by Facebook can be found in Facebook’s privacy policy.

## Use of Adobe Fonts for presentation of content

In order to provide a uniform presentation of the content on our website, the script code “Adobe Fonts” from [Adobe, Inc.](#) 345 Park Avenue San Jose, CA 95110-2704, USA (“Adobe”) collects data (IP address, time of visit, device and browser information), transmits it to Adobe and then processes it by Adobe. We have no influence on this subsequent data processing. There is no adequacy decision for the United States by the European Commission. Our cooperation is based on standard data protection clauses adopted by the European Commission. The data processing is carried out on the basis of an agreement between jointly responsible parties in accordance with Art. 26 GDPR.

## 6. Social Media

### 6.1 Social Plugins by Facebook, Twitter, Instagram

Social buttons by social networks are used on our website. These are only integrated into the page as HTML links, so that no connection to the servers of the respective provider is established when our website is accessed. If you click on one of the buttons, the website of the respective social network will open in a new window of your browser. There you can click e.g. the Like or Share button.

### 6.2 Our online presence on Facebook, Twitter, Instagram, Youtube, Pinterest, LinkedIn, Xing

If you have given your consent to the respective social media provider in accordance with Art. 6 (1) (a) GDPR, when you visit our online presence on the social media mentioned above, your data will be automatically collected and stored for market research and advertising purposes, from which user profiles are created using pseudonyms. These can be used, for example, to place advertisements within and outside the platforms that presumably correspond to your interests. Cookies are usually used for this purpose. For detailed information on the processing and use of data by the respective social media provider, as well as a contact option and your rights and settings options for the protection of your privacy, please refer to the provider’s privacy policies linked below. Should you still require assistance in this regard, please contact us.

**Facebook** is provided by Facebook Ireland Ltd, 4 Grand Canal Square, Dublin 2, Ireland (hereafter “Facebook Ireland”) The information automatically collected by Facebook Ireland about your use of our online presence on Facebook is usually transferred to a server of Facebook, Inc, 1601 Willow Road, Menlo Park, California 94025, USA and stored there. There is no adequacy decision for the United States by the European Commission.

Our cooperation is based on standard data protection clauses adopted by the European Commission. Data processing in the context of a visit to a Facebook fan page is based on an agreement between joint controllers in accordance with Art. 26 GDPR. Further information (information on Insights data) can be found [here](#).

**Twitter** is provided by Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland (“Twitter”). The information automatically collected by Twitter about your use of our online presence on Twitter is generally transmitted to and stored on a server at Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. There is no adequacy decision for the United States by the European Commission. Our cooperation is based on standard data protection clauses adopted by the European Commission.

**Instagram** is provided by Facebook Ireland Ltd, 4 Grand Canal Square, Dublin 2, Ireland (hereafter “Facebook Ireland”) The information automatically collected by Facebook Ireland about your use of our online presence on Instagram is typically transferred to and stored on a server at Facebook, Inc, 1601 Willow Road, Menlo Park, California 94025, USA. There is no adequacy decision for the United States by the European Commission. Our cooperation is based on standard data protection clauses adopted by the European Commission. Data processing in the context of a visit to an Instagram fan page is based on an agreement between joint controllers in accordance with art. 26 DSGVO. Further information (information on Insights data) can be found [here](#).

**YouTube** is provided by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland (hereafter “Google”). The information automatically collected by Google about your use of our online presence on YouTube is generally transferred to a server of Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA and stored there. There is no adequacy decision for the United States by the European Commission. Our cooperation is based on standard data protection clauses adopted by the European Commission.

**Pinterest** is provided by Pinterest Europe Ltd, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland (hereafter “Pinterest”). The information automatically collected by Pinterest about your use of our online presence on Pinterest is usually transferred to and stored on a server of Pinterest, Inc, 505 Brannan St, San Francisco, CA 94107, USA. There is no adequacy decision for the United States by the European Commission. Our cooperation is based on standard data protection clauses adopted by the European Commission.

**LinkedIn** is provided by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland (“LinkedIn”). The information LinkedIn automatically collects about your use of our online presence on LinkedIn is generally sent to a server at LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA and stored there. There is no adequacy decision for the United States by the European Commission. Our cooperation is based on standard data protection clauses adopted by the European Commission.

## 7. Contact options and your rights

Being the data subject, you have the following rights according to:

- 15 GDPR, the right to obtain information about your personal data which we process, within the scope described therein;
  
- 16 GDPR, the right to immediately demand rectification of incorrect or completion of your personal data stored by us;
  
- 17 GDPR, the right to request erasure of your personal data stored with us, unless further processing is required
  - o to exercise the right of freedom of expression and information;
  
  - o for compliance with a legal obligation;
  
  - o for reasons of public interest or
  
  - o for establishing, exercising or defending legal claims;



- 18 GDPR, the right to request restriction of processing of your personal data, insofar as
  - the accuracy of the data is contested by you;
  - the processing is unlawful, but you refuse their erasure;
  - we no longer need the data, but you need it to establish, exercise or defend legal claims, or
  - you have lodged an objection to the processing. 21 GDPR;
  
- 20 GDPR, the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request its transmission to another controller;
  
- 77 GDPR, the right to complain to a supervisory authority. If you reside in the UK, you may lodge your complaint with the Information Commissioner's Office.

Otherwise, you may contact the supervisory authority at your habitual place of residence or workplace or at our company headquarters.

If you have any questions about how we collect, process or use your personal data, want to enquire about, correct, restrict or delete your data, or withdraw any consents you have given, or opt-out of any particular data use, please contact us directly using the contact data provided in our legal notice.

### **Right to object**

If we process personal data as described above to protect our legitimate interests that are overriding in the process of balancing of interests, you may object to such data processing with future effect. If your data are processed for direct marketing purposes, you may exercise this right at any time as described above. If your data are processed for other purposes, you have the right to object only on grounds relating to your particular situation.

After you have exercised your right to object, we will no longer process your personal data for such purposes unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

This does not apply to the processing of personal data for direct marketing purposes. In such a case we will no longer process your personal data for such purposes.

## **PATIENT PRIVACY NOTICE**

The MEDIKA Clinic is committed to protecting your privacy and meeting the requirements of data protection legislation. This privacy notice explains:

- what personal data we collect about you;
- why we collect that personal data;
- who we share your personal data with;
- why we might contact you and how you can change that;
- how long we retain your personal data;
- how we keep your personal data secure; and
- what rights you have in relation to your personal data.

When we talk about “personal data” in this notice, we mean any information which could be used to identify you, either directly or indirectly when combined with any other information we may hold about you.

In this privacy notice, when we refer to “we”, “us” or “our”, we mean The MEDIKA Clinic Ltd, operating under the trading name of ‘The MEDIKA Clinic, registered office at No1 Spinningfields, 1 Hardman Square, Manchester, England, M3 3EB.

If you need to contact us about this privacy notice or further details on how we use your personal information, please contact us by email on [info@medika.health](mailto:info@medika.health).

## PERSONAL DATA COLLECTED BY THE MEDIKA CLINIC

The doctors, nurses and team of healthcare professionals caring for you keep records about your health and any treatment and care you receive from us. These records help to ensure that you receive the best possible care.

They may be written down in paper records or held on computer. These records may include:

- Basic details about you such as name, address, date of birth, next of kin, etc.
- Contact we have had with you such as appointments or clinic visits
- Notes and reports about your health, treatment and care
- Results of x-rays, scans and laboratory tests
- Relevant information from people who care for you and know you well such as health professionals and relatives

It is essential that your details which we hold are accurate and up to date. **Always check that your personal details are correct when you visit us and please inform us of any changes as soon as possible.**

## PURPOSES FOR COLLECTING AND USING THAT PERSONAL DATA –

Your personal data is used for a variety of different purposes, but only in circumstances where we have a legal basis to do so. Those purposes and the bases we rely upon are set out below.

### (1) Delivery of care and treatment

Your data is most commonly used to direct, manage and deliver the care you receive to ensure that:

- The doctors, nurses and other healthcare professionals involved in your care have accurate and up to date information to assess your health and decide on the most appropriate care for you
- Healthcare professionals have the information they need to be able to assess and improve the quality and type of care you receive
- Your concerns can be properly investigated if a complaint or any concerns are raised
- Appropriate information is available if you see another doctor, or are referred to a specialist or another part of the healthcare system to ensure you receive continuity of care

We generally do so on the basis that it is necessary for us to use your data in this way in order to fulfil our contract with you to provide you with healthcare services. In exceptional circumstances, we may be required to use your information in order to protect your vital interests or those of another person for example. Such incidents are very rare, such as a situation where you are incapacitated and using your health data is necessary to provide emergency treatment.

## **(2) Improving the quality of our services / other uses of your data**

Your information will also be used to help us manage and protect the health of the public by being used to:

- Review the care we provide to ensure it is of the highest standard and quality
- Ensure our services can meet patient needs in the future
- Investigate patient queries, complaints and legal claims
- Ensure the clinic receives payment for the care you receive
- Prepare statistics on our performance

- Audit our accounts and services
- Undertaking health research and development (with your explicit consent - you may choose whether or not to be involved)
- Helping to train and educate healthcare professionals where we do not have a contractual or legal obligation to handle your data in a particular way or your explicit consent to use your information for a specific purpose, we have a legitimate interest to conduct general business processes and improve the quality and safety of the health care and treatment we provide. When relying on our legitimate interests we conduct an assessment to ensure that this use of your data is fair, proportionate and in no way detrimental. We will also only use your data where it is necessary for us to do so in connection with the provision of health care or treatment, or the management of such services.

We may also need to use your information for the purposes of establishing, exercising or defending our legal rights, for example in the event of a complaint.

### **(3) Research**

In some circumstances we may want to use your personal data for the purposes of undertaking health research development. However, we will only do so where you have provided your explicit consent, which can be subsequently withdrawn at any time.

### **(4) Marketing**

We may also contact you about goods and services which we think may be of interest to you but only where you have specifically consented to us using your information in this way. If you do consent to receive marketing materials then this can be withdrawn at any time.

### **WHO WE SHARE YOUR PERSONAL DATA WITH—**

Everyone working within healthcare is subject to a legal duty to keep information about you confidential. Similarly, anyone who receives information from us is under the same a

legal duty.

We may need to share information with the following organisations so we can all work together for your benefit, if they have a genuine need for it, or we have your consent. Therefore, we may also share your information, subject to the restrictions set out in this privacy notice about how it will be used, with:

- Private insurers that are involved in your care
- Your General Practitioner (GP)
- Ambulance Services
- PHIN (Private Healthcare Information Network) who are the government's recognised body for processing private patient's data
- Social Care Services
- Local Authorities



- Voluntary and private sector providers working with us

We will not disclose your information to any other third parties without your consent unless there are exceptional circumstances, such as if your health and safety or that of others is at risk or if the law requires us to pass on information.

You have the right to restrict how and with whom we share the personal information in your records that identifies you if that information is inaccurate, held by us unlawfully, or is no longer needed by us. This must be noted explicitly within your records in order that all healthcare professionals and staff treating and involved with you are aware of your decision. By choosing this option, you should be mindful that it may make the provision of treatment or care more difficult or unavailable and that it may be necessary to override that restriction if deemed necessary to do so for your safety and or that of others. You can also change your mind at any time about a disclosure decision.

#### RECEIVING COMMUNICATIONS FROM THE MEDIKA CLINIC—

When attending our facilities for an outpatient appointment or a procedure you may be asked to confirm that we have an accurate email address, contact number and/or mobile telephone number for you. This can be used to provide appointment details via email, SMS text messages and automated calls to advise you of appointment times, with your consent.

We may also contact you about goods and services which we think may be of interest to you but, as set out above, only where you have consented to us using your information in this way.

#### UPDATING YOUR PREFERENCES—

You can update your communications preferences at any time by informing a member of staff or emailing us on [info@medika.health](mailto:info@medika.health)

#### RETENTION OF PERSONAL DATA—

We retain personal data for no longer than required and in line with The MEDIKA Clinic's retention schedule. This is based on statutory requirements and legal obligations, as well as our business requirements.

#### SECURITY OF PERSONAL DATA—

We take our duty to protect your personal information and confidentiality very seriously and we are committed to taking all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, whether computerised or on paper. Where we have a need to transfer data outside of the European Economic Area (EEA) we do so with appropriate safeguards in place.

## PERSONAL DATA AND YOUR RIGHTS –

Data protection legislation gives you the right to:

- Correct any data we hold about you that is not correct (Rectification)
- Request, in certain circumstances, that we delete your personal data (Erasure). We are not obliged to give effect to all such requests, for example if we are under a legal obligation to retain your data or we need to keep it in order to establish, defend or exercise legal claims.
- Block or suppress the further processing of your personal data in certain circumstances (Restriction)
- Request access to personal data that we hold about you (Subject Access)
- In some circumstances, receive the personal data which you have provided to us, in a structured, commonly used and machine-readable format and have this transmitted to another data controller (Data Portability)
- Withdraw consent where this is the legal basis for us processing your information

- Object to processing where The MEDIKA Clinic is relying on its legitimate interests as the legal ground for processing
  
- Not be subject to automatic decisions (i.e. decisions that are made about you by computer alone) that have a legal or other significant effect on you.

Please contact the Data Protection Officer using the details above if you wish to exercise your rights in relation to personal data. Our policy is to verify the authenticity of all requests made, and requests may be refused if we are unable to verify the identity of the requester.

If you have concerns about the way we have handled your personal data please contact the us by email in the first instance: [info@medika.health](mailto:info@medika.health). If you remain unsatisfied you can contact the Information Commissioner's Office (ICO) on 0303 123 1113, by emailing [casework@ico.org.uk](mailto:casework@ico.org.uk).