

# **Ally Health Privacy Policy**

## **Introduction**

Welcome to Ally Health's privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy lets you know how we look after your personal data when you use our service, and gives you information about your privacy rights and how the law protects you.

### **1. Important information and who we are**

#### **Purpose of this privacy policy**

This privacy policy explains how Ally Health Ltd collects and processes your personal data when you use our services, including any personal data you may provide through this website when you request services.

This website is not intended for children and we do not knowingly collect data relating to children. You must be over 18 years of age to use our services.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware

of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

## **Controller**

Ally Health Ltd is the data controller and responsible for your personal data (collectively referred to as "Ally Health", "we", "us" or "our" in this privacy policy).

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

## **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Ally Health Ltd

Email address: [customersupport@allyhealth.co.uk](mailto:customersupport@allyhealth.co.uk)

Postal address: C/O Bcs Windsor House, Station Court, Station Road, Great Shelford, Cambridge, England, CB22 5NE.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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 policy and your duty to inform us of changes**

We keep our privacy policy under regular review and will post any new versions of the privacy policy online from time to time.

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 policy 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 as follows:

- **Identity Data** includes name, email address and age.
- **Contact Data** includes home address, phone number and email address.

- **Transaction Data** includes details about products and services you have requested 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.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Sensitive & Health Data** includes health data that you share with us or we receive from third party service providers, such as health records, NHS number, samples (including blood fluids), genetic data, health data including laboratory test results, doctors notes relating to test results and/or details of your sex life and/or sexual orientation.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific product or 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 policy.

#### **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 or 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:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - sign up to use, receive or request our services;
  - book an appointment to receive clinical care;
  - complete a healthcare intervention; or
  - give us feedback or contact us.
- **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 and other similar technologies.

### **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:

- Where we need to perform the contract we are about to enter into or have entered into with you.

- 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.
- For sensitive and personal data, when we have your consent to do so.
- Where we need to comply with a legal obligation.

### Purposes for which we will use your personal data

We have set out below 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 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	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver services you have requested from us	(a) Identity (b) Contact (d) Transaction (e) Marketing and Communications (f) Sensitive and Health	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to operate our business) (c) Consent (for sensitive and health data)
To manage our relationship with you, including to determine the correct healthcare intervention you should receive	(a) Identity (b) Contact (c) Transaction (d) Usage (e) Marketing and Communications (f) Sensitive and Health	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to operate our business) (d) Consent (for sensitive and health data)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (e) Sensitive and Health	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated

marketing, customer relationships and experiences		and relevant, to develop our business and to inform our marketing strategy)
To enable the NHS and/or Public Health England to undertake resource planning and public health monitoring and statistical analysis (including where there is a requirement to report transmissible diseases)	(a) Identity (b) Contact (c) Sensitive and Health	(a) Necessary to comply with a legal obligation (b) For our legitimate interests (to expand and develop our business) (c) Consent (for sensitive and health data)
To enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity	a) Identity (b) Contact (c) Transaction (d) Usage (e) Marketing and Communications (f) Sensitive and Health	(a) Necessary to comply with a legal obligation (b) For our legitimate interests (to protect our business) (c) Consent (for sensitive and health data)

### Promotional offers from us

From time to time, we may use your Identity, Contact, Technical, Usage and Sensitive and Health Data to form a view on what we think you may want or need, or what may be of interest to you. If we have your permission to do so, we may use this information to send you marketing.

### 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.

### Change of purpose

We will only use your personal 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 compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows 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 following third parties set out below when necessary for the purposes set out in the table above.

- Lab partners or other collaborators to whom it may be necessary to disclose your personal data in order to provide the services that you request.
- Vetted healthcare practitioners and Care Quality Commission registered organisations contracted by us to provide nursing, phlebotomy or other products or services.

- Companies that have asked us to provide services to you. This will not include Sensitive or Health Data, unless you have asked us to share this data.
- Service providers that we use to operate our business, such as third-party software providers, data hosting, customer relationship management, email delivery, marketing, fulfilment or payment processing providers.
- Regulatory authorities such as NHS England, Public Health England, or other foreign regulatory authorities.
- Law enforcement bodies, when required to do so by law.
- 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 policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

We have use service providers that are based outside the UK, so their processing of your personal data will involve a transfer of data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that appropriate legal safeguards are implemented.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **8. Data retention**

### **How long will you use my personal data for?**

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. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 unauthorised use or disclosure of your personal data, the purposes

for which we process your personal data 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 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.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the right to:

- request access to your personal data;
- request correction of your personal data;
- request erasure of your personal data;
- object to processing of your personal data;
- request restriction of processing your personal data;
- request transfer of your personal data; and/or
- withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **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 could refuse to comply with your request in these circumstances.

Updated: 28/02/2023