

**May 2018**

## Legal bases for processing your personal data

Under the EU General Data Protection Regulation (GDPR) Doctaly is a Data Controller in relation to processing your personal data. Doctaly relies on legitimate interests for processing any biographical data (such as your name and address) in order to provide access to our online service and GP services. For any personal data related to your health, we rely on your explicit consent for processing that data and will make this clear to you during the booking journey on our website or app.

## Data we collect directly from you

Under the lawful basis of legitimate interests, when you sign up to use the Doctaly service we collect the following information from you: your name, address, email and phone number, date of birth and gender. When you submit your financial information for payment purposes, your details will be sent to a secure PCI DSS-compliant site (Stripe). Payment details will never pass through our servers, therefore we do not hold a record of them. Doctaly does not store any of your financial details. Under the lawful basis of Consent, when you book an appointment through the service we will also ask for your explicit consent in relation to data related to your health. Doctaly does not have visibility of your consultation records or investigation results, but we do see whether you have been booked in for a further investigation, for invoicing purposes with our pathology partner, The Doctors Laboratory (TDL). If your employer provides you with Doctaly services as an employee benefit, we will not share any of your personal data related to your use of the service.

Once you have provided your details to Doctaly and proceed with making a GP appointment, Doctaly will share your data with the relevant GP practice, who operate as a separate Data Controller (please see individual GP practices for their privacy notice on how they process your personal data). If you are sent for blood tests, Doctaly will also share your personal details with TDL, who operate as a Data Processor for Doctaly, see their privacy policy [here](#).

Under the lawful basis of legitimate interests, we also use your data for marketing purposes. Doctaly operates an email newsletter programme, used to inform users about products and services supplied. You can be added to the newsletter database by opting-in at the point of submitting your personal details via the web form. You will have the option to unsubscribe from any further marketing communication from Doctaly in each subsequent email.

## Data we collect indirectly

Doctaly uses cookies on our website. The Doctaly website uses a cookie control system asking you to allow or disallow the use of cookies on your computer/device upon your first visit to our website. The Doctaly website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. The Doctaly Cookie Notice [here](#) provides more information on our use of cookies.

Emails we send to you are tracked through MailChimp in relation to open rates, link clicks and other user engagement.

## How long we keep your data for

We have set retention periods in relation to your data. Doctaly do not have visibility of any medical records not related to the Doctaly service. Doctaly store the details of the type of blood test you have been sent for (if applicable) but do not have visibility of any results. We delete any records related to blood tests after six months (the period required for invoicing purposes between Doctaly and TDL).

As Doctaly is a service that may not be required frequently, we will keep your details for a maximum of two years for financial and invoicing purposes, from the date of your booking, before asking you whether you want to continue to use the service. You have the option to request that we delete the information we hold on you at any time, unless we are required to keep that information for statutory obligations. In relation to any data we use for marketing purposes, we will always give you the option to opt-out from receiving marketing communications from us. If you request for your details to be deleted, we will ask if you would still like to hear from us in relation to the Doctaly service.

## Keeping your data secure

We will only transfer and store your data in EEA countries or those that have been deemed adequate by the European Commission. We also take all reasonable steps to ensure that your data is managed securely. We store your data in third-party cloud services that we have checked and approved and who we have deemed adhere to a robust set of security standards. For payments we use the secure payment service Stripe.

## Your rights over your personal data

You have the right to request access to the data we hold on you free of charge (unless the request is for multiple copies). If you would like to submit a Subject Access Request, please email [privacy@doctaly.com](mailto:privacy@doctaly.com)

You also have the right to request the correction of your personal data if it is inaccurate or out-of-date. If you would like to request any changes to your data, please email [privacy@doctaly.com](mailto:privacy@doctaly.com)

You also have the right to withdraw your consent for any special categories data (this includes data related to health, political opinions, sexual orientation, and so on).

You have the right to request that we stop using your data for direct marketing. If you would like us to stop using your data for marketing purpose, there is an unsubscribe option at the bottom of every email that we send you, or contact us at [privacy@doctaly.com](mailto:privacy@doctaly.com)

## Verifying your identity

In order to protect the confidentiality of your personal data, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

## Changes to this notice

If we make any changes to this privacy notice we will notify you via email, as well as posting an up-to-date privacy notice on our website, and linked to via our app.

## Contacting the Regulator

If you would like to raise a complaint with the UK data protection regulator in relation to how we handle your data, please contact the Information Commissioner's Office (ICO). Doctaly are registered as a Data Controller with the ICO under the full company name, BDM Medical LTD, with registration number ZA180429.

## Contact us

We are always happy to help with any questions or concerns related to this privacy notice. If you would like to get in touch, please contact [privacy@doctaly.com](mailto:privacy@doctaly.com).