

## October 2020

This Privacy Policy for the Doctaly website sets out how Doctaly uses and protects any information that you provide Doctaly when you use this website. We have another Privacy Notice for individuals who sign up to the Doctaly service, which will be provided to you at the start of the booking process that outlines exactly what we do with your personal data if you book an appointment with a GP through our platform. This privacy notice also includes any use of personal data for marketing purposes, details of the data we collect and your rights over your personal data. Under the EU General Data Protection Regulation (GDPR) BDM Medical LTD is a registered Data Controller for this website. We are committed to providing transparency in relation to the personal data we collect and are always happy to take any questions. If you would like to get in touch with us, please see the section of this Privacy Notice on 'Your Rights as a Data Subject'.

### Lawful basis for processing your personal data

For the purpose of operating this website and for processing individuals' personal data in we use the lawful bases of Legitimate Interests and Consent. We draw on the lawful basis of Consent for Cookies placed on your computer during your use of our website. For any marketing activities, we rely on Legitimate Interests. For the lawful bases we rely on for processing your personal data beyond this website.

**Patient Privacy Notice** [here](#)

**GP Privacy Notice** [here](#)

**Partner Privacy Notice** [here](#)

### Personal data we collect

#### Cookies

Doctaly uses cookies to improve the user experience and to provide Doctaly with information for analytics purposes to improve our service. These Cookies are used to optimise the service we provide through our website, allowing us to analyse numbers of site visitors, page visits and user engagement.

This website uses a cookie control system allowing you to allow or disallow the use of cookies on your computer/device on your first visit to our website.

Our Cookies Notice provides further details on how we use cookies [here](#).

#### Marketing

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. As required by the Privacy and Electronic Communications Regulations 2003 (PECR), subscribers are given the opportunity to unsubscribe at any time through an automated system. This process is detailed at the footer of each email campaign.

## Analytics for our website

Doctaly uses Google Analytics on our website, in order to have visibility of the number of unique visitors to our website, and the landing pages of users. However, this is aggregate data and we do not use this information for anything other than aggregating statistics on website usage.

## Email tracking

Emails we send to you are tracked through MailChimp and we collect information in relation to open rates, click-through, unsubscribe, and subject line testing. We will ask for your consent for this email tracking when you sign-up to the Doctaly service, in relation to our marketing activities.

## How long we keep your data for

We have set retention periods in relation to your data. In relation to marketing activities for GPs, Patients and Partners, we will keep your data for marketing purposes until you unsubscribe, after which time you won't receive any further communications from Doctaly. We have set retention periods for all other personal data we collect from you, and further details can be found in your Privacy Notices.

You also have the right to ask us to stop any direct marketing activities at any time (contact details are detailed in the section on 'Your rights over your personal data' below).

## 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](#).

## Transfers to third parties

We may share your personal data with the following categories of third parties:

- Where you have provided consent, we may share your personal data with the third parties to whom you have consented, such as when you authorise a third party to contact you in relation to a service.
- To our service providers, business partners and contractors who provide services on our behalf or who we use to support our business.
- We may also share your personal data with other third parties in the context of the possible sale or restructuring of the business, and will instruct those recipients that they must use the personal data only for the purposes described in this notice.
- We may need to share your personal data with a regulator, competent law enforcement body, government agency, court or other third party to (i) comply with the law; (ii) enforce the terms of a contract; and (iii) protect the rights, property, or safety of BDM Medical Limited or others.

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy notice applicable to the website in question.

## 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 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.

## Contacting the regulator

If you would like to raise a complaint with the UK Supervisory Authority 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).