

Privacy policy for MyVeins Ltd.

Registered company number 08079828

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.4 In this policy, "we", "us" and "our" refer to MyVeins Ltd. For more information about us, see Section 11.

2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) The general categories of personal data that we may process;
 - (b) The purposes for which we may process personal data; and
 - (c) The legal bases of the processing.
- 3.2 We may process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths. This usage data may be processed using Google analytics for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name, address, telephone number, email address, gender and date of birth. The source of the service data is you or your general practitioner/referral source. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.4 We may process information contained in any enquiry you submit to us regarding our services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering these services to you. The legal basis for this processing is your implied consent to our contacting you.
- 3.5 We may process information relating to transactions, including provision of the services that you request from us ("**transaction data**"). The transaction data may include your contact details. The

transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

- 3.6 We do not process information that you provide to us for the purpose of subscribing to email notifications and/or newsletters ("**notification data**").
- 3.7 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 3.8 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.9 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.10 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.11 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.2 We may disclose your personal data (name, address date of birth email address and insurer details) to our suppliers or subcontractors insofar as reasonably necessary for billing purposes after you have utilized our services.
- 4.3 Financial transactions relating to our services are handled by our payment services providers, Medical Billing and Collection Ltd. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://medbc.co.uk>.
- 4.4 We do not disclose your enquiry data to any third party suppliers of goods and services.

4.5 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. Retaining and deleting personal data

5.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data in accordance with the guidelines set by The Private and Voluntary Health Care (England) Regulations 2001, Schedule 3 as follows:

Type of patient	Minimum period of retention
Patient who was under the age of 17 at the date on which the treatment to which the records refer was concluded.	Until the patient's 25th birthday.
Patient who was aged 17 at the date on which the treatment to which the records refer was concluded.	Until the patient's 26th birthday.
Patient who died before attaining the age of 18.	A period of 8 years beginning on the date of the patient's death.
Patient who was treated for mental disorder during the period to which the records refer.	A period of 20 years beginning on the date of the last entry in the record.
Patient who was treated for mental disorder during the period to which the records refer and who died whilst receiving that treatment.	A period of 8 years beginning on the date of the patient's death.
Patient whose records relate to treatment by general practitioner.	A period of 10 years beginning on the date of the last entry.
Patient who has received an organ transplant.	A period of 11 years beginning on the date of the patient's death or discharge whichever is the earlier.
All other cases.	A period of 8 years beginning on the date of the last entry in the record.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the clinical nature of your presentation and whether we expect you may need continuing treatment at intervals in the future.

5.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7. Your rights

- 7.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) The payment of a fee (currently fixed at GBP 10); and
 - (b) The supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 7.2 We may withhold personal information that you request to the extent permitted by law.
- 7.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 7.4 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8. About cookies

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies

- 9.1 We may use cookies to help us to analyse the use and performance of our website and services (cookies used for this purpose are derived via Google-analytics.com). See section 11 for further details.
- 9.2 We do not use cookies for the following purposes:
- (a) Authentication - cookies to identify you when you visit our website and as you navigate our website
 - (b) Status - cookies to help determine if you are logged into our website
 - (c) Personalisation - cookies to store information about your preferences and to personalise the website for you.
 - (d) Security - cookies used to protect user accounts

(e) Advertising - cookies to help to display advertisements that will be relevant to you.

10. Cookies used by our service providers

10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

10.2 We use Google analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website.

11. Our details

11.1 This website is owned and operated by MyVeins Ltd.

11.2 We are registered in England and Wales under registration number 08079828 and our registered office is at c/o Sandison Easson & Co Rex Buildings, Wilmslow, Cheshire SK9 1HY

11.3 Our principal place of business is at The Shalbourne Suite, The Great Western Hospital, Marlborough Road, Swindon, Wiltshire SN3 6BB.

11.4 You can contact us for general questions and data protection enquiries:

- (a) By post, to the Shalbourne Suite
- (b) Using our website contact form
- (c) By telephone, on the contact number published on our website from time to time; or
- (d) By email, using the email address published on our website from time to time

Please be aware that we do not accept clinical questions concerning your condition nor will we review photographs to provide a diagnosis. If you have any specific questions about any medical matter, you should consult your doctor or other professional healthcare provider. If you think you may be suffering from any medical condition, you should seek immediate medical attention. Information provided in this website is not designed to be a substitute for a face-to-face medical consultation and should not be used as such.