



FlyingMedicine Ltd

Privacy Policy – External

[This policy should be circulated to non-employees, including Patients, although FlyingMedicine Ltd should consider the extent to which the provisions are applicable to patients and other contacts. If necessary, FlyingMedicine Ltd should use more than one privacy policy for non-employees.]

When FlyingMedicine Ltd processes your personal data, it is required to comply with the Data Protection Act 2018 ('DPA') and the UK GDPR (the DPA and UK GDPR are together referred to as the 'Data Protection Legislation').

Your personal data includes all the information we hold that identifies you or is about you, for example, your name, email address, postal address, date of birth, location data and in some cases, opinions that we document about you, as well as special categories of data, including but not limited to, medical and health records, and information about your religious beliefs, ethnic origin and race, sexual orientation and political views. It may also include opinions about you, opinions given by you and information from which we learn something about you *[Update as necessary to reflect the personal data that is being processed about the data subjects to whom this data privacy policy will be provided]*.

Everything we do with your personal data counts as processing it - including collecting, storing, amending, transferring and deleting it. We comply with the data protection legislation to make sure that your information is properly protected and used appropriately.

This privacy policy provides information about the personal data we process, why we process it and how we process it.

Our responsibilities

FlyingMedicine Ltd is the controller of the personal data you provide. We have appointed Dr Nomy Ahmed as Managing Director and they will have day to day responsibility for ensuring that we comply with the data protection legislation and for dealing with any requests we receive from individuals exercising their rights under the data protection legislation. *[This can be updated to reference another job title as having responsibility for compliance with data protection legislation where no DPO has been appointed. If possible, avoid referencing a named individual in case that individual ceases to have responsibility or leaves FlyingMedicine Ltd]*.

What personal data do we process about you?

[Note: FlyingMedicine Ltd should include as much information as possible about the types of data it processes. Some examples are included below but these will need to be reviewed and updated on a case-by-case basis]

We process your personal data in order to provide you with the services you have requested, to fulfil the contract we have entered into with you and/or to receive services or goods from you. We may also process your personal data to respond to any queries or comments you submit to us and to correspond with you on a day-to-day basis. *[Note, this paragraph tries to cover all bases including provision and receipt of*

services. FlyingMedicine Ltd may feel it is more appropriate to use more than one privacy policy for non- employees]

If we do not receive the personal data from you, we may be unable to fulfil our obligations to you.

More information about the personal data we process is set out below: [Patients]

[Personal data that we may process about you (depending on the extent of the information you have provided to us) includes:

Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender

Contact data such as your address, email address and telephone numbers of financial data including your bank account and payment card details

Special categories of data including information about your medical background and health and diversity/equality information such as your race and ethnicity

Opinions about you, opinions given by you and other information from which we learn something about you

We process most of your information on the grounds of consent from you, legitimate interests (such as *[please insert a description of the legitimate interests you are pursuing when you process personal data]*), performance of a contract we have entered into with you, protection of vital interests of an individual or, in the case of special categories of data, processing for the provision of health or social care or treatment or the management of health or social care systems or services. *[Please delete any that are not appropriate, particularly if FlyingMedicine Ltd chooses to use more than one data privacy policy depending on the type of data subject].*

[Suppliers]

[Personal data that we may process about you includes:

Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender

Contact data such as your billing address and delivery address (whether residential or your company address), email address and telephone numbers

Financial data including your bank account and payment card details (except to the extent the financial information is company rather than personal information); and

Transaction data including details about payments made to you (where you are an individual)]

We process most of your information on the grounds of our legitimate interests (including a business relationship with you or the company for which you work) and fulfilment of our contract with you (where you are an individual). Any information we process about the company for which you work rather than you as an individual is not covered by this data privacy policy.

[Candidates]

[Personal data that we are likely to process about you includes:

Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender

Contact data such as your postal address, email address and telephone numbers Background data such as your education, career background and work experience Personal information such as your skills and qualities

Any other information that you include on any CV, application or covering letter you send to us. If this information includes special categories of data, we will process that information on the grounds of consent because you have chosen to provide it to us.]

We process most of your information on the grounds of our legitimate interests to determine whether or not we have a suitable vacancy for you, or on the grounds of our legal obligations.

If we obtain consent from you to the processing of your personal data, you can withdraw your consent at any time. This will not affect the lawfulness of any processing we carried out prior to you withdrawing your consent.

Who will receive your personal data?

We only transfer your personal data to the extent we need to. Recipients of your personal data include:

[insert any potential recipients or categories of recipients]

We do not transfer your personal data outside of the EEA.

[If FlyingMedicine Ltd transfers personal data outside of the EEA, delete this sentence and include the paragraph below instead].

We may transfer your personal data outside of the EEA to *[name of recipient of data outside EEA]*. [A finding of adequacy has been made in respect of *[relevant country]*, which means the UK Government is satisfied that any data transferred to *[relevant country]* will be adequately protected]. [We will transfer your personal data on the basis of safeguards included in a written agreement between FlyingMedicine Ltd and the recipient of your personal data. *[This paragraph should be included if FlyingMedicine Ltd transfers personal data outside the EEA. There are a number of optional clauses within this paragraph. FlyingMedicine Ltd will need to consider the location of the recipient and the grounds on which personal data is transferred and update this paragraph accordingly].*

How long will we keep your personal data?

We will retain your personal data for [confirm retention period if you have opted for one overarching retention period. If you have multiple retention periods for different types of external contacts (which is likely to be the case), you may refer to a separate retentions schedule which could be attached to this policy or available on request or separate out the different external contacts and the corresponding retention periods within this policy. There must be valid reasons to retain the personal data for the chosen period of time. Personal data must not be retained 'just in case' it is needed in the future. Further guidance about appropriate retention periods for employee and HR personal data is included in the Data Security and Data Retention Policy and Procedure]. Your information will be kept securely at all times. Following the end of the relevant retention period, your files and the personal data covered by the retention period will be permanently deleted or destroyed.

What are your rights?

You benefit from a number of rights in respect of the personal data we hold about you. We have summarized the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner's Office website (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>). These rights apply for the period in which we process your data. There are certain caveats and exemptions to some of your rights which may mean that, in some circumstances, you may not be entitled to exercise them. If we believe that is the case upon receipt, we will let you know.

1. Access to your data

You have the right to ask us to confirm that we process your personal data, as well as access to and copies of your personal data. You can also ask us to provide a range of information about the ways in which we process your data, although most of that information corresponds to the information set out in this privacy policy.

2. Rectification of your data

If you believe personal data that we hold about you is inaccurate or incomplete, you can ask us to rectify that information.

3. Right to be forgotten

In some circumstances, you have the right to ask us to delete personal data we hold about you.

4. Right to restrict processing

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data, but we do not have to delete it.

5. Data portability

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller.

6. Right to object

You are entitled to object to us processing your personal data:

If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority

For the purposes of scientific or historical research and statistics

Your right to complain about our processing

If you think we have processed your personal data unlawfully or that we have not complied with UK GDPR, please get in touch with us so that we can help. We will always acknowledge any complaints that you submit within 30 days and will take appropriate steps to investigate the complaint without undue delay. We will promptly inform you of the outcome once such investigations have concluded.

You may also report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ('ICO'). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website: <https://ico.org.uk/concerns/>.

Any questions?

If you have any questions or would like more information about the ways in which we process your data, please contact info@flyingmedicine.uk