

Privacy Policy

One5 Health LTD (“We, Us, Our”) is committed to protecting and respecting your privacy.

This policy (and any other document referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

For the purpose of the General Data Protection Regulation 2016 (GDPR), (as amended or re-enacted from time to time) and all applicable laws and regulations relating to the processing of personal data and privacy, including (insofar as it is in force from time to time) the General Data Protection Regulation ((EU) 2016/679) (the “Data Protection Legislation”), the data controller is One5 Health LTD with registered address at: 98A Southgate Road, London, N1 3JD, registered in England Number 11950184.

One5 Health LTD understands that your information is entrusted to us and we are committed to protecting and respecting your privacy. To this end One5 Health LTD complies with data protection legislation regarding data processing and with clinical confidentiality guidelines. Everything we do with your personal data counts as processing it, including collecting, storing, amending, transferring and deleting it.

When we refer to “personal information or “personal data”” in this policy, we mean information that could or has the potential to identify you as an individual or provides information about you. Accordingly, we may hold and use information about you as a customer, a patient, or in any other capacity, eg when you visit our websites, complete a form, access our services or speak to us.

Security of your personal information

We endeavour to protect all information we hold about you by ensuring that we have appropriate security measures in place to prevent unauthorised

access, information being lost, destroyed or damaged. Please see our [Fair Processing Notice](#) for full details of how we process personal data that you share with us through means other than the website (www.one5.health).

Information collected during service enquiries

When you contact us to enquire about a service or a product, we will collect personal information about you to enable us to provide you with the information that you have enquired about. Information collected will be kept securely and only accessed by those individuals responsible for ensuring you are provided with the correct information about our services.

Telephone calls

In the interests of staff training and continually improving our services, calls to One5 Health LTD and its agents may be monitored or recorded.

Health information collected during treatments and services

Where sensitive clinical information is collected it will be kept confidential and secure and will only be disclosed to and received from those individuals involved with your treatment or care, or to their agents and, if applicable and only with your explicit consent, to any person or organisation who may be responsible for meeting your treatment expenses or their agents. Information may be provided to external service providers and regulatory bodies for the purpose of clinical audit or compliance monitoring to ensure the highest standards of care and record keeping are maintained.

The highest standards of confidentiality will be applied to your personal data in accordance with data protection law and confidentiality. Any publishing of this data for One5 Health LTD's audit or research purposes will be in a coded or anonymised form. Anonymous or aggregated data may be used by One5 Health LTD, or disclosed to others, for research or statistical purposes.

Information entered onto the One5 Health LTD website

The One5 Health LTD website, www.one5.health (the “Website”) is controlled and owned by One5 Health LTD.

One5 Health LTD takes a proactive approach to website user privacy and ensures that the necessary steps are taken to protect the privacy of its users throughout their visiting experience. The One5 Health LTD website complies with all UK national laws and requirements for user privacy. For full details, please be sure to read our [Website Privacy Policy](#) before using or submitting information to the website.

By using the website, you agree to the terms of this Overarching Privacy Policy and our Website Privacy Policy. Whenever you submit information via the website, you consent to the collection, use, and disclosure of that information in accordance with these policies. The website is intended for use by residents of the United Kingdom.

Use of Cookies

Cookies are text files containing small amounts of information which may be downloaded to your computer or mobile device when you visit a website or webpage. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie to help One5 Health LTD to analyse and improve use of our website. Cookies are useful because they help the website, or another website, to recognise your device the next time you visit.

We use cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse the website and also allows us to improve the service and the website. For full details, please be sure to read our Cookies Policy before using the website.

Marketing

If you have consented to our processing your personal information for marketing purposes we may send you information about One5 Health LTD

products and services which may be of interest to you. You have the right to ask us not to process your information in this way at any time. If you no longer wish to receive web based marketing information you can unsubscribe. For non-web based marketing information please write to our Privacy Officer at the address given at the end of this document.

Fraud

Personal data may be disclosed to others with a view to preventing fraud or to assist in police investigations in line with the GDPR.

CCTV

One5 Health LTD premises are surveyed by CCTV under the grounds of legitimate interest for the purpose of security. Images and videos may be retained for a limited period. To learn more, please see our CCTV Statement.

Accessing and updating your information

You benefit from a number of rights with respect to the personal data we hold about you, depending upon the grounds on which we process your data and subject to exemptions. These include the right of access to and rectification of your personal data (including access to or the ability to request copies of your medical records), the right to restrict or object to data processing, withdraw consent or be forgotten, the right to complain to the Information Commissioner's Office (ICO) and the right to data portability. Where possible, we will process your request within one month free of charge.

1. INFORMATION WE COLLECT FROM 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 (known as "anonymous data").

We will collect and process the following data about you:

- Information you give us. This is information about you that you give us by filling in booking forms on our site or on our application or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site or our application, subscribe to or use our services, including participating in a consultation with any of our clinicians, search for a service, make a booking on our site or our application, enter a competition, promotion or survey, sign-up to our email newsletter and when you report a problem with our site or our application. The information you give us may include your name, date of birth, address, e-mail address, phone number, gender, financial and credit card information, photograph or ID documentation, and any other information that you provide to us about yourself.
- Information we collect about you. With regard to each of your visits to our site or our application we will automatically collect the following information:
 - Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products or services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.
- Special categories of personal data. We may ask you to provide us with certain special categories of personal information, particularly during the course of a consultation. Such data may include data concerning your health, including medical records and past medical history, sex life or sexual orientation.
- Information we receive from other sources. This is information we receive about you if you use any of the websites with which we are affiliated and through which you can make a booking for our services or in order to provide the services to you. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies and pharmacies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

2. USES MADE OF YOUR INFORMATION

We will only use your personal data when the law allows us to. Most commonly, we will use your personal information:

- To carry out our obligations arising from any contracts entered into between you and us or to take steps at your request before entering into any contracts;
- To comply with any legal obligations to which we are subject; or
- Where it is necessary for our or a third party's legitimate interests, including for the purposes of preventing fraud, except where such interests are overridden by your interests or fundamental rights and freedoms.

Special categories of personal data. We will only use and process such data where:

- It is necessary for the purposes of preventive or occupational medicine, medical diagnosis, or the provision of health care or treatment;
- You have provided your explicit consent to us doing so; or
- Where it is necessary for the establishment, exercise or defence of legal claims

If we intend to process your special category personal data for any other lawful purpose, we will notify you before doing so (where possible) of the legal basis on which we are seeking to rely

3. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, 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	Identity, contact details, ID documentation	Performance of a contract with you
To process and provide the	Identity, contact details	(a) Performance of a contract with you
Services that you have ordered including: (a) Manage payments, fees and charges; (b) Collect and recover money owed to us	and financial and credit card information	(b) Necessary for our legitimate interests (to recover debts due to us)
To carry out a consultation and to provide you with medical advice or treatment	Identity, special categories of data concerning your health, sex life and sexual orientation, other information regarding your lifestyle	(a) Performance of a contract with you (b) Special categories of data - necessary for the purposes of preventive or occupational medicine, medical diagnosis, or the provision of health care or treatment, or where you have provided your explicit consent
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy; (b) Asking you to leave a review or take a survey	Identity, contact details, and marketing preferences	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data	Identity, contact details and technical data such as IP address	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Analysis, testing, system maintenance, support, reporting and hosting of data)		security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity, contact details, technical data such as IP address, marketing preferences	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical data such as IP address	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity, contact details, usage data and marketing preferences	Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your identity, contact details, usage data, technical data and marketing preferences to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any company outside the Medic Spot Limited group for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

If we intend to use your information for any other purpose, we will let you know what we intend to do with such data and the legal basis we are relying on for processing such data. This may include obtaining your express consent to the use of such data

4. DISCLOSURE OF YOUR INFORMATION

Other than in respect of special category personal data, you agree that we have the right to share your personal information with the third parties set out below, or any other third parties notified to you, for the purposes set out in paragraph 3 above:

- The pharmacy where you may collect a prescription.
- Other healthcare professionals such as your NHS GP.
- Stripe, our payment services provider.
- Trustpilot, to keep track of user reviews
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK.
- Regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or mere 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.

- Fraud prevention agencies.

We will only share your special category personal information with third parties where:

- It is necessary for the purposes of preventive or occupational medicine, medical diagnosis, or the provision of health care or treatment; or
- You have provided your explicit consent to us doing so; or
- Where it is necessary for the establishment, exercise or defence of legal claims.

If we intend to share your special category personal data with any third parties for any other lawful purpose, we will notify you before doing so (where possible) of the legal basis on which we are seeking to rely.

Where you participate in a consultation, the relevant clinician will make notes of your consultation and the treatment or advice provided. No consultation will be recorded. We encourage you to allow us to share your consultation notes with your regular doctor or general practitioner, but we will only do so with your explicit consent. In such circumstances, we will only disclose so much of your clinical notes as you request.

5. INTERNATIONAL TRANSFERS

Some of our external third parties may be based outside the European Economic Area (“EEA”) so their processing of your personal data would involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6. WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers in the UK and is encrypted.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site or our application, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site or our application; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

ACCESS TO INFORMATION

The Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Legislation. You may request details or a copy of the personal data that we hold about you by writing to us at 98A Southgate Road, London, N1 3JD.

7. YOUR RIGHTS

Under the Data Protection Legislation:

- Where you have provided your consent to the processing of your personal data for any purpose, you have the right to withdraw such consent at any time by contacting us at 98A Southgate Road, London, N1 3JD or by email to care@one5.health
- You can ask us to rectify any inaccuracies in the personal information that we hold about you.
- You may have the right to request the erasure of personal information that we hold about you where there is no good reason for us to continue processing it, where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

- You may have the right to object to our processing of your personal data for certain purposes, including for direct marketing purposes, for scientific or historical research purposes or statistical purposes.
- You may have the right to restrict our processing of your personal data in certain circumstances.
- You may have the right to request a copy of your personal data from us in a commonly used and machine-readable format or that we transmit your personal data to another data controller.
- You may have the right not to be subject to automated decision-making, including profiling, which has legal or other significant effects on you.

You can exercise any of the above rights at any time by contacting us at 98A Southgate Road, London, N1 3JD or by email to care@one5.health

8. ANONYMISED AND AGGREGATED DATA

We may anonymise and aggregate your personal data and process and share such data with third parties in order to monitor usage of our site, our application and our services, to market and improve our services, or for research purposes. You will not be capable of being identified from such data and we may use such data indefinitely without further notice to you.

9. LINKS TO AND FROM OUR SITE

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

10. ACCESS TO INFORMATION

The Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Legislation. You may request details or a copy of the personal data that we hold about you by writing to us at 98A Southgate Road, London, N1 3JD.

11. RETENTION

We will only retain your personal information for as long as is necessary to carry out the purpose for which it was collected.

12. CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

13. COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We use Google Analytics to analyse the use of our site. The analytics cookies used by our site have the following names. The analytics cookies used on our site have the following names: `_ga`, `_gat`, `utma`, `utmt`, `utmb`, `utmc`, `utmz` and `utmv`. Google Analytics' privacy policy is available at: <http://www.google.com/policies/privacy/>.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. In particular:

- We use Google Analytics to analyse the use of our site. The analytics cookies used by our site have the following names. The analytics cookies used on our site have the following names: _ga, _gat, utma, utmt, utmb, utmc, utmz and utmv. Google Analytics' privacy policy is available at: <http://www.google.com/policies/privacy/>.
- To determine your interests, Google will track your behaviour on our site and on other websites across the internet using the DoubleClick cookie. This behaviour tracking allows Google to tailor the advertisements you see on other websites to reflect your interests (we do not publish interest-based advertisements on our site). You can view, delete or add interest categories associated with your browser by visiting: <http://www.google.com/settings/ads/>. You can also opt out of the AdSense partner network cookie using those settings or using the NAI's (Network Advertising Initiative's) multi-cookie opt-out mechanism at: <http://www.networkadvertising.org/choices/>. However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-in available at: <https://www.google.com/settings/ads/plugin>.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

14. CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to 98A Southgate Road, London, N1 3JD. or emailed to care@one5.health

If you have any complaints relating to our privacy policy or our use of your personal data, please contact us at 98A Southgate Road, London, N1 3JD or by email to care@one5.health. You also have the right to make a complaint to the Information Commissioner's Office. Further information can be found at <https://ico.org.uk/>.

If any of your details change or are incorrect please let us know as soon as possible.

For any queries you may have regarding our processing or personal data, please contact our Privacy Officer or any other member of our team in person, by post, by emailing care@one5.health or writing to the address given at the end of this document.

Changes to our privacy statement

We keep our privacy policies under regular review and as a result they may be amended from time to time without notice. As a result we encourage you to review these privacy policies regularly.

Contact

If you have any questions in relation to our privacy policies please contact:

Privacy Officer

Email: care@one5.health