

# Privacy Policy

## Version History

Date	Version	Reason for Change	Author
07/11/2024	1.1.0	Initial generation	Data Protection Officer UK

## Privacy policy

### Introduction

This policy explains how we collect, use, and safeguard your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), EU General Data Protection Regulation (EU GDPR) and the Data Protection Act 2018.

### Who We Are

Med AI Solutions infers both Med AI Solution LTD and Med AI Solutions GmbH. Med AI Solutions LTD is a subsidiary of Med AI Solutions GmbH, headquartered in Germany. For the purposes of UK data protection law; Med AI Solutions LTD is the data controller for personal data collected and processed in the UK. Med AI Solutions GmbH is the data controller for personal data collected and processed in the EU.

Med AI Solutions respects the privacy of its customers, suppliers and partners. We have therefore formulated and implemented a policy on complete transparency regarding the processing of personal data, its purpose(s) and the possibilities to exercise your legal rights in the best possible way. For employees, we have formulated a separate privacy policy, available upon employment and upon request.

This privacy policy pertains to processing by Med AI Solutions by means other than through the use of cookies. Med AI Solutions has formulated a separate cookie policy, which can be found on our Med AI Solutions's websites:

<https://med-ai-solutions.com/cookie-policy/>

### Definitions

Party responsible for processing personal data: Med AI Solutions; with registered address at Compass House Vision Park, Chivers Way in United Kingdom; company registration number 15782133 and Data Protection Officer who can be reached at [dpo@med-ai-solutions.com](mailto:dpo@med-ai-solutions.com) (the "Controller").

UK Data Protection Authority for Med AI Solutions LTD refers to The Data Protection Authority of the United Kingdom (Information Commissioners Office).

And;

Germany Data Protection Authority for Med AI Solutions GmbH refers to The Data Protection Authority of Germany

- Party responsible for processing personal data in the UK: Med AI Solutions; with registered address at Compass House Vision Park, Chivers Way in United Kingdom; company registration number 15782133 and Data Protection Officer Peter Case-Upton who can be reached at [dpo@med-ai-solutions.com](mailto:dpo@med-ai-solutions.com) (the "Controller").
- Data Protection Authority: Information Commissioners Office
- Data Protection laws:
  - For European citizens or residents, the EU GDPR 2018; the EU e-privacy directive 2002 (soon to be replaced by the EU e-privacy regulation);
  - For UK citizens or residents, the UK GDPR 2020 and the UK Data Protection Act 2018
  - and the national laws of the countries where we operate.

## Collection of data

- Your personal data will be collected by Med AI Solutions and its data processors.
- Personal data means any information relating to an identified or identifiable natural person ('data subject').
- An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The types of personal data we may process through third party applications:

<b>Business process</b>	<b>Data</b>	<b>Legal basis</b>
Compliance	Contractors - First Name, Email Address, Last Name Employees - First Name, Last Name, Email Address, Job Title Customers: First Name, Last Name, Email Address, Job Title	Legal Obligation Compliance
Marketing	Customers - Job Title, Last Name, Email Address, User Name, First Name	Legitimate Interests Pursuit
Payment Processing	Customers: Bank account or credit card number	Making of a Contract
Task Management	Customers: Subscription Data, First Name, Last Name, Email Address	Legitimate Interests Pursuit
Document Storage	Users - User Name, Email Address, First Name, Subscription Data, Last Name	Legitimate Interests Pursuit
Office Management	Customers - Job Title, Last Name, Email Address, User Name, First Name	Legitimate Interests Pursuit
Security	Customers: First Name, Last Name, Email Address, Job Title	Legitimate Interests Pursuit
CRM	Customers: Telephone Number, First Name, Last Name, Job Title, Email Address, User Name	Data Subject Consent
Email	Customers: First Name, Last Name, Job Title, Email Address, User Name	Legitimate Interests Pursuit

Customer Service	Customers: Telephone Number, First Name, Last Name, Job Title, Email Address	Data Subject Consent
Communication	Customers: First Name, Last Name, Job Title, Email Address, Telephone Number	Legitimate Interests Pursuit
Training	Customers: First Name, Last Name, Email Address, User Name	Data Subject Consent
Application Hosting	Patients - General Health Data	Legitimate Interests Pursuit
Work Planning	Customers - Telephone Number, First Name, Contracts, Last Name, Job Title, Email Address	Legitimate Interests Pursuit

The types of personal data we may process through suppliers:

Business process	Data	Legal basis
Sales	Users: First Name, Last Name, Job Title, Email Address, Mobile Device Information, Contracts Suppliers: First Name, Last Name, Job Title, Email Address, Telephone Number, Contracts Patients: First Name, Last Name, General Health Data, User Name, NHS Number, Date of Birth	Legitimate Interests Pursuit
Technology Hardware	Patients: General Health Data, User Name Users: First Name, Last Name, Job Title	GDPR article 9 (2) (h) processing is necessary for the purposes of provision of health care.
Data Centre Services	Users: First Name, Last Name, Job Title, Email Address, Mobile Device Information, Contracts Patients: First Name, Last Name, General Health Data, NHS Number, Date of Birth	GDPR article 9 (2) (h) processing is necessary for the purposes of provision of health care.
Training	Users: First Name, Last Name, Job Title, Email Address, Mobile Device Information, Contracts Patients: First Name, Last Name, General Health Data, NHS Number, Date of Birth	Data Subject Consent
Legal	Users: First Name, Last Name, Job Title, Email Address, Mobile Device Information, Contracts Suppliers: First Name, Last Name, Job Title, Email Address, Telephone Number, Contracts	Legal Obligation Compliance
Human Resources	Users: First Name, Last Name, Job Title, Email Address, Mobile Device Information, Contracts Suppliers: First Name, Last Name, Job Title, Email Address, Telephone	Legal Obligation Compliance

	Number, Contracts Patients: First Name, Last Name, General Health Data, NHS Number, Date of Birth	
Product Development	Patients: First Name, Last Name, General Health Data, NHS Number, Date of Birth Users: First Name, Last Name, Job Title, Mobile Device Information, Contracts	Legitimate Interests Pursuit
IT Supplier	Users: First Name, Last Name, Job Title, Mobile Device Information, Email Address, Contracts Patients: First Name, Last Name, General Health Data, NHS Number, Date of Birth	GDPR article 9 (2) (h) processing is necessary for the purposes of provision of health care.
Website Hosting	Users: First Name, Last Name, Job Title, Email Address, Mobile Device Information, Contracts Suppliers: First Name, Last Name, Job Title, Email Address, Telephone Number, Contracts Patients: First Name, Last Name, General Health Data, NHS Number, Date of Birth	GDPR article 9 (2) (h) processing is necessary for the purposes of provision of health care.
Website Development	Users: First Name, Last Name, Job Title, Email Address, Mobile Device Information, Contracts	GDPR article 9 (2) (h) processing is necessary for the purposes of provision of health care.
Consultancy	Users: First Name, Last Name, Job Title, Email Address, Mobile Device Information, Contracts Patients: First Name, Last Name, General Health Data, NHS Number, Date of Birth	GDPR article 9 (2) (h) processing is necessary for the purposes of provision of health care.

## Purposes

Med AI Solutions processes personal data for the following purposes:

- Customer, employee, contractor, partner, or supplier management
- Business and financial administration
- Direct marketing and customer acquisition
- Delivery of goods or services
- Work planning and resource allocation

## How We Collect, Store, or Otherwise Process Your Data

The following business processes describe how we may collect, store, or otherwise process personal information:

- Website Interaction: Collection of cookies, newsletter subscriptions, or contact form submissions on our website(s).
- Service Enhancement: Analyse trends and user profiles for our legitimate interest to enhance, modify, personalise, and improve our services and communications for the benefit of our customers.
- Support and Communication: Process and respond to support requests, enquiries, and complaints received via business email.
- Service Delivery: Provide requested services and products, and communicate about them. This is necessary to fulfill our contract with you and is in line with our legitimate business interest.
- Administrative Activities: Manage invoicing, payment collection, and other financial activities either locally or through cloud services.
- Document Management: Store and exchange personal information in documents via email and cloud services.
- Marketing: Conduct direct marketing campaigns and customer acquisition efforts via email or using cloud services, based on legitimate interest or explicit consent.

## Sharing data with third parties

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your Personal Data outside United Kingdom. If we do, you can expect a similar degree of protection in respect of your Personal Data.

We will only share your Personal Data with third parties in accordance with the GDPR and as outlined in the legal justification table above.

We share your personal data with the following enterprise third parties. We also share your data with SME third parties, details of which are available upon request. You will be notified when we have engaged with a new third party recipient of your personal data.

<b>Function</b>	HR, Marketing, Office Management, Task Management, Work Planning
<b>Data categories</b>	Contracts, Email Address, First Name, Job Title, Last Name, Subscription Data, User Name
<b>Data subjects</b>	Employees, Customers
<b>Security measures</b>	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Monday.com

<b>Function</b>	Communication, CRM, Customer Service, Work Planning
<b>Data categories</b>	Contracts, Email Address, First Name, Job Title, Last Name, Telephone Number
<b>Data subjects</b>	Customers, Stakeholders
<b>Security measures</b>	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Salesforce

<b>Function</b>	CRM, Email, Marketing, Office Management
<b>Data categories</b>	Email Address, First Name, Job Title, Last Name, User Name
<b>Data subjects</b>	Customers
<b>Security measures</b>	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Naq Cyber

<b>Function</b>	Compliance, Document Storage, Security, Technical Tool, Training, Work Planning
<b>Data categories</b>	Email Address, First Name, Job Title, Last Name
<b>Data subjects</b>	Contractors, Employees
<b>Security measures</b>	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

## International data transfers

The third parties we have engaged for the abovementioned business process may transfer your personal information to outside of your jurisdiction. Med AI Solutions's third party processors take all necessary measures to ensure the confidentiality, availability and integrity of personal data and to comply with the GDPR with regards to international data transfers. The international nature of its compliance certifications, as well as far-reaching technical security measures (including but not limited to encryption of the personal data, making the data illegible to an unauthorised recipient) are sufficient to ensure that the data subjects continue to benefit from the fundamental rights they are entitled to under the GDPR.

Where Med AI Solutions transfers data to third countries, it relies on the following legal grounds for international data transfers:

- An Adequacy Decision in accordance with article 45 of the GDPR
- In the absence of an Adequacy Decision, appropriate safeguards in the form of Standard Contractual Clauses or Binding Corporate Rules.

In the event that Med AI Solutions is reliant on Standard Contractual Clauses for the legality of its international data transfer, it ensures that the Processor or Subprocessor takes supplementary security measures to safeguard the international data transfer with one or more of the following measures:

- Encryption;
- Anonymisation;
- Pseudonymisation.

## Storage and protection of data

Your data is protected by Med AI Solutions and its processors in pursuance to all legal requirements set by the relevant data processing laws. Med AI Solutions has taken technical and organizational security measures to protect your data and requires its data processors to meet the same requirements. Med AI Solutions has signed processing agreements with its processors to ensure an adequate level of data protection.

The following security measures are taken by Med AI Solutions to protect your personal data in the course of the listed business processes:

## Organisational security measures

### *Staff*

Med AI Solutions staff members are required to conduct themselves in a manner consistent with Med AI Solutions's guidelines regarding confidentiality, business ethics, appropriate usage, and professional standards. All staff members undergo appropriate background checks prior to hiring and sign a confidentiality agreement outlining their responsibility in protecting customer data.

We continuously train staff members on best security practices, including how to identify social hacks, phishing scams, and hackers.

### *Access controls*

Med AI Solutions maintains your data privacy by allowing only authorized individuals access to information when it is critical to complete tasks for you. Med AI Solutions staff members will not process customer data without authorization.

### *Data hosting*

As a rule, data is hosted within countries and areas that provide a substantially similar level of protection as data subjects have under the GDPR. To ensure this, we rely on Adequacy Decisions as a legal basis for our international data transfers. In exceptional circumstances, where data is transferred to a country or area not subject to an Adequacy Decision, we rely on Standard Contractual Clauses with the recipient and take supplementary security measures to secure this data transfer, such as anonymisation.

### *Physical security*

The data centres on which personal data is hosted are secured and monitored 24/7 and physical access to facilities is strictly limited to select staff.

### Technical security measures

All devices which are used to access personal data for which we are responsible are secured with antivirus software, firewalls, encryption and access management. We regularly update operating systems and software to ensure vulnerabilities cannot be exploited.

We carry out regular vulnerability scanning of our website and have engaged credentialed external auditors to verify the adequacy of

our security and privacy measures.

## Your rights regarding information

Each data subject has the right to information on and access to, and rectification, erasure and restriction of processing of their personal data, as well as the right to object to the processing and the right to data portability. You also have the right to request that you are not made subject to decision making based solely on automated processes, including profiling, if these decisions would have a significant effect on you.

You can exercise these rights by contacting us at the following email address: [info@med-ai-solutions.com](mailto:info@med-ai-solutions.com). If we have any doubts as to your identity, we may request you to provide us with proof of identification, such as through sending us a copy of your valid ID. Ensure that you write "Data Request" in the subject line of your email.

Within one month of the submitted request, you will receive an answer from us. We will not charge you for submitting your request unless the request is manifestly unfounded or otherwise unreasonable in its nature. Depending on the complexity and the number of the requests this period may be extended to two months.

## Marketing

By providing your consent, you agree to receive marketing communications, including promotional offers, updates, and news about our products and services. We may contact you via email, SMS, or other channels based on the preferences you specify. We value your privacy and assure you that your personal data will be handled in compliance with applicable data protection laws and our Privacy Policy.

- If you opt-in to receive marketing emails, you may receive commercial offers from Med AI Solutions. If you do not wish to receive them (anymore), please send us an email to the following address: [info@med-ai-solutions.com](mailto:info@med-ai-solutions.com) and ensure that you write "Data Opt-Out" in the subject line of your email.
- Your personal data will not be used by our partners for commercial purposes.
- If you encounter any personal data from other data subjects while visiting our website, you are to refrain from collection, any unauthorized use or any other act that constitutes an infringement of the privacy of the data subject(s) in question. The collector is not responsible in these circumstances.

## Data retention

The collected data are used and retained for the duration determined by law. You may, at any time, request your data to be deleted from any Med AI Solutions account, system or other data processing medium in accordance with the process described above.

This exclusion limits data access requests under GDPR Article 9(2)(h), which allows the processing of sensitive personal data for preventive or occupational medicine, medical diagnosis, or healthcare services. The exclusion applies where granting access could hinder healthcare services, compromise ongoing medical treatments, or violate the confidentiality of third parties. While individuals generally have the right to access their data, this exclusion protects the integrity of healthcare processes, ensuring that data necessary for medical and occupational purposes remains confidential. Appeals against access refusals will be reviewed case-by-case to ensure compliance with GDPR.

## Applicable law

These conditions are governed by the laws and regulations of the country where we are headquartered. The court in the district where we are headquartered has the sole jurisdiction if any dispute regarding these conditions may arise, save when a legal exception applies.

## Children's Data

We do not knowingly process children's data, unless specifically stated in this Privacy Policy. If you have concerns about or knowledge of a child using our services, products, websites or apps without parental consent, please contact our DPO via [dpo@med-ai-solutions.com](mailto:dpo@med-ai-solutions.com) to ensure we can take appropriate action as soon as possible.

## Contact

For questions about this privacy policy, product information or information about the website itself, please contact: [dpo@med-ai-solutions.com](mailto:dpo@med-ai-solutions.com)

If you are not happy with our responses or the way we have dealt with your complaint in the UK; please contact the ICO at the Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

**Telephone:** 0303 123 1113



# International data transfers & Third Party Applications

## Microsoft Office 365

<b>Third party headquarter address</b>	1 Microsoft Way, Redmond, WA 98052-6399, United States of America
<b>The primary location of processing is the United States of America.</b>	Personal data collected by Microsoft Office 365 may be stored and processed in any country where Microsoft Office 365 or its affiliates, subsidiaries, or service providers operate facilities.
<b>Safeguards (art. 45 GDPR)</b>	Adequacy decision exists between United Kingdom and United States of America
<b>Additional safeguards</b>	<ul style="list-style-type: none"><li>▪ Encryption</li><li>▪ Anonymisation where possible</li><li>▪ Pseudonymisation where possible</li></ul>
<b>For more information, see Microsoft Office 365's Privacy Policy</b>	<a href="https://privacy.microsoft.com/en-ca/privacystatement">https://privacy.microsoft.com/en-ca/privacystatement</a>

## Monday.com

<b>Third party headquarter address</b>	Tel Aviv-Yafo, Yitzhak Sadeh St 6, Israel
<b>The primary location of processing is Israel.</b>	Personal data collected by Monday.com may be stored and processed in any country where Monday.com or its affiliates, subsidiaries, or service providers operate facilities.
<b>Safeguards (art. 45 GDPR)</b>	Adequacy decision exists between United Kingdom and Israel
<b>Additional safeguards</b>	<ul style="list-style-type: none"><li>▪ Encryption</li><li>▪ Anonymisation where possible</li><li>▪ Pseudonymisation where possible</li></ul>
<b>For more information, see Monday.com's Privacy Policy</b>	<a href="https://monday.com/trustcenter/privacy">https://monday.com/trustcenter/privacy</a>

## Salesforce

<b>Third party headquarter address</b>	Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, United States of America
<b>The primary location of processing is the United States of America.</b>	Personal data collected by Salesforce may be stored and processed in any country where Salesforce or its affiliates, subsidiaries, or service providers operate facilities.
<b>Safeguards (art. 45 GDPR)</b>	Adequacy decision exists between United Kingdom and United States of America
<b>Additional safeguards</b>	<ul style="list-style-type: none"><li>▪ Encryption</li><li>▪ Anonymisation where possible</li><li>▪ Pseudonymisation where possible</li></ul>
<b>For more information, see Salesforce's Privacy Policy</b>	<a href="https://www.salesforce.com/eu/company/privacy/full_privacy/">https://www.salesforce.com/eu/company/privacy/full_privacy/</a>

Naq Cyber

<b>Third party headquarter address</b>	Vlamingstraat 4, 2712BZ, Zoetermeer, The Netherlands
<b>The primary location of processing is the The Netherlands.</b>	Personal data collected by Naq Cyber may be stored and processed in any country where Naq Cyber or its affiliates, subsidiaries, or service providers operate facilities.
<b>Safeguards (art. 45 GDPR)</b>	Adequacy decision exists between United Kingdom and The Netherlands
<b>Additional safeguards</b>	<ul style="list-style-type: none"> <li>▪ Encryption</li> <li>▪ Anonymisation where possible</li> <li>▪ Pseudonymisation where possible</li> </ul>
<b>For more information, see Naq Cyber’s Privacy Policy</b>	<a href="https://www.naqcyber.com/policies/privacy-policy">https://www.naqcyber.com/policies/privacy-policy</a>

Suppliers

Med AI Solutions GmbH

<b>Country where data is processed or sent to</b>	Germany
<b>Safeguards (art. 45 GDPR)</b>	Adequacy decision exists between United Kingdom and Germany
<b>Additional safeguards</b>	<ul style="list-style-type: none"> <li>▪ Encryption</li> <li>▪ Anonymisation where possible</li> <li>▪ Pseudonymisation where possible</li> </ul>

AIRS Medical

<b>Country where data is processed or sent to</b>	South Korea
<b>Safeguards (art. 45 GDPR)</b>	Adequacy decision exists between United Kingdom and South Korea. Standard Contractual Clauses
<b>Additional safeguards</b>	<ul style="list-style-type: none"> <li>▪ Encryption</li> <li>▪ Anonymisation where possible</li> <li>▪ Pseudonymisation where possible</li> </ul>

