

## DOCTRIN UNITED KINGDOM DATA PROTECTION AND PRIVACY NOTICE

This Privacy Notice is in respect of our operations in the United Kingdom

Doctrin Limited is the UK commercial entity for the Doctrin Group. The Doctrin Group comprises Doctrin AB and any subsidiaries trading under the brand name “Doctrin”. Doctrin is fully compliant with GDPR standards and requirements and relevant national standards and requirements.

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you use our Platform or when we communicate with you, as a customer or supplier, for marketing purposes or otherwise and tell you about your privacy rights and how the law protects you.

### Purpose and scope

This privacy notice aims to give you information on how Doctrin collects and processes your personal data through your use of this website and our solution, including any data you may provide through this website, when you sign up to our newsletter or purchase a product or service.

Employees and individual contractors are not covered by this privacy notice. Individual contractors are covered instead by the employees and contractor privacy notice.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and those provided by our customers and is not intended to override them.

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

- Where we need to do so in order to perform the contract we are about to enter into or have entered into with you or the customer organisation
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

With respect to Personal Data, we may act as a Data Processor or as a Data Controller depending upon the personal data and the purpose for which it is being held and used.

In relation to your personal Data held on the Doctrin Platform you should in the first instance make the request to the customer organisations Data Protection Officer who is using the platform to provide your care and is the Data Controller for that information.

## Doctrin as a Data Processor

Doctrin provide a digital healthcare platform used to support the delivery of virtual healthcare, with the potential to link information across multiple health care or social care organisations. We are a data processor for our customers and in accordance with the data processing agreement we have with them to hold and process data on their behalf.

Patients will see a privacy notice provided on the first page of the Doctrin platform when they access it for online consultation.

We may collect User Profile data (username; login details; role; computer ID; national ID, contact details), and generate message delivery receipts, application related data (the user generated personal signatures for their messages; templates they have generated and saved); usernames, login details for your account if applicable for the application that your organisation is using.

The patient data that we typically gather comprises name, date of birth, demographics, contact details, and consultation data, messages, and correspondence (including patient images, documents, and notes) captured within the Doctrin Platform. This may include the patient's health information and other special categories of data, plus message delivery receipts, unique identifier, mobile number, and email address. Users and Patients may be asked to respond to specific surveys.

We also gather messages between users, colleagues, and patients. These are used to provide our services that your organisation has requested.

Doctrin also collects usage data, such as when you open and close our software, what product features you use and what computer or device you are using. This allows us to improve our software by better understanding your workflows, to provide you with usage data, to monitor the functioning of our software and to prevent fraud, cyberattacks and other dishonest behaviour.

Patient and User data is kept in line with the relevant national guidance or legislation and as required by each customer in their role as Data Controller.

We use third-party data processors, such as our email, video communication, SMS, and storage providers. Your information may also be shared with other health care and social care organisations in the context of your exchange of messages through the Doctrin platform.

All our 3rd party partners are fully compliant with GDPR and based in the European Economic Area (EEA). It is guaranteed for EU or UK clients and patients is hosted on a server is within the EEA in line with national best practice guidelines on health and social care cloud security.

We compile anonymised statistics about the use of our platform, such as the use of different features by our users. All personal data is removed by aggregating the data to practice level or above

## Doctrin as Data Controller

We may be deemed a Data Controller on occasion, for example where we:

- Capture information through our website
- Hold data on individuals as part of our business processes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

We hold relevant data on our customers and may process corporate prospects' contacts or past corporate clients' contacts data, including for direct marketing purposes, subject to the right to object and any opt-out exercised. We may process job candidates' CVs and related data as long as this may be required in relation to the selection process.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We retain data relating to our clients' and prospects' relating to our services for as long as necessary for the purpose of providing the service, pursue a sales opportunity, or market our services, this is subject to the right to object or not to be subject to direct marketing. Individuals should contact ([support@doctrin.com](mailto:support@doctrin.com)) to request that Doctrin delete data held about them.

By law we have to keep basic information about our customers and suppliers (including Contact, Identity, Financial and Transaction Data) as required by the relevant authorities after they cease being customers for tax purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

If you want to access your personal information, request correction, deletion, transfer, restrict or object to the processing of your data, including for direct marketing purposes, email us at [DPO@doctrin.com](mailto:DPO@doctrin.com).

You can ask us to stop sending you marketing messages at any time by following the opt-out links on marketing messages sent to you or by contacting us.

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

## How secure is your data?

Your personal data is held securely and in a way that meets the relevant customer and national requirements. It is accessible only to those with a legitimate need to access do so.

Our network and data hosting meets and is managed in accordance with the relevant national Cyber and Network Security standards.

We have a range of policies including for cyber security, information governance, data processing and business processes, which are regularly reviewed and updated. These are reviewed and confirmed at Board level on a minimum annual basis.

Some of our customers are based outside the European Economic Area (EEA) so their processing of personal data will involve a transfer of data outside the EEA. Whenever data is transferred out of the EEA, we ensure a similar degree of protection is afforded to that within the EEA.

All staff and contractors receive Information Governance and Cyber Security as part of their on-boarding and all staff attend mandatory annual training to ensure they understand our policies, processes, and their responsibilities.

We have put in place procedures to deal with any suspected personal data breach and will notify you, any Data Controller and applicable regulator of a breach where we are legally required to do so.

## Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Data Protection Officer

We have appointed a Data Privacy Officer (DPO) for the Doctrin Group and its companies. They are responsible for overseeing questions in relation to this privacy notice.

If you have any questions about this privacy notice, including any requests to exercise your legal right. You can send any questions about privacy or contact our DPO on [dpo@doctrin.com](mailto:dpo@doctrin.com)

Each EU Member State has a designated data protection supervisory authority.

Individuals have the right to raise a complaint with the supervisory authority in the Member State where they live, where they work, or where the infringement took place.

## Doctrin

Doctrin comprises the following legal entities:

Doctrin Limited  
5th Floor  
2 Wellington Place  
Leeds  
LS1 4AP  
United Kingdom

UK Supervisory Authority:  
Information Commissioners Office (ICO)  
[www.ico.org.uk](http://www.ico.org.uk)  
ICO registration: ZA789739

Doctrin AB  
Sankt Eriksgatan 121D  
113 43  
Stockholm  
Sweden

Swedish Supervisory Authority  
Swedish Authority for Privacy Protection (IMY)  
[www.imy.se](http://www.imy.se)