

POL_402	Mapmydiabetes Privacy Policy	Authorised:
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## 1 INTRODUCTION

Mapmydiabetes (the “**Service**”) is a service operated by Mapmyhealth Limited (“**Us**”, “**Our**”, “**We**”), a company registered in England and Wales with Registered Number **7989820**.

This privacy policy, (together with the Mapmydiabetes terms of use, cookie policy and any other documents referred to in these policies) sets out the basis on which any information we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By using this Service, you agree: a) to the collection, transfer, processing, storage, disclosure and other uses of your information as described in this privacy policy; b) to give your healthcare professional access to your information and c) to be governed by this privacy policy.

For the purpose of the Data Protection Act 1998 (the “**Act**”), we are a Data Controller registered with the Information Commissioners Officer under registration number **ZA050707**.

All of the different forms of data, content, and information described below are collectively referred to as “**information**.” Where that data identifies you personally it is “**personal information**”, and where personal information relates to your physical or mental health or condition, or your ethnicity or religion it is “**sensitive personal information**”. Where we process your information to remove personal information, the resulting information is “**anonymised information**”.

Healthcare professionals (**HCPs**) will typically be the nurse or doctor who set up your user account, but it may also include any authorised person within the surgery or other healthcare provider organisation who would normally have access to your personal and sensitive personal information.

Mapmydiabetes is a registered trade mark.

## 2 SCOPE

This privacy policy relates to our Mapmydiabetes service, a patient self-management system built on the MyHealth Engine patient self-management platform

## 3 POLICY

### OUR APPROACH:

1. We respect your privacy.

2. We believe that individuals have a key role in engaging with their own healthcare. We also believe that better health outcomes for individuals can be achieved by us:
  - providing secure and confidential electronic communication tools between individuals and their HCP; and
  - gathering anonymised information (including but not limited to information about conditions, allergies, medications, age, sex and ethnicity) to better inform public health decision making, and also to enable you to take advantage of a variety of applications developed by third parties to assist with the management of your own health conditions by you together with your HCP(s) .
3. For these reasons, the default position for use of the Service is that:
  - **HCPs will have access to all of your information.** No-one other than your HCP has access to all of your information, unless you choose to share it with them;
  - We have access to your name and email address for purpose of administrating your user account. Our employees do not have access to any other information you or your HCP add to the Service, except as set out at clause 4 below.
  - The Service will process your personal information and personal sensitive information to anonymise and/or aggregate the information (such that it cannot identify you and is in no way personal to you). We can access this anonymised and/or aggregated information and it will be used by us or by third parties including the NHS, other HCPs and academic departments for research purposes (such as understanding the illnesses we are trying to treat, the prevention and management of health issues, informing decisions about public health interventions and health resource planning and improving the Service).
  - The Service encrypts and protects certain elements of your information (including some of your personal information and all of your sensitive personal information)

#### **INFORMATION THAT WE MAY COLLECT FROM YOU**

4. We may collect information from or about you in the following ways:
  - When you contact us (we may keep a record of the correspondence).
  - When you correspond with your HCP.
  - If you agree to complete one of our surveys that we use for research purposes.
  - We may also collect information about the following:

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- i. your network enabled devices, e.g. computer, laptop, tablet, smart phone or other device, including the device's IP address, operating system and browser type;
- ii. what you search for on our Service and other interactions with the Service. This is statistical data about your browsing actions and patterns, and does not identify you. It is used for administration and to improve the Service; and
- iii. your use of the Service by using a cookie file (as more fully detailed in our Cookie Policy [link]).

Some devices allow applications to access real-time location-based information (for example, GPS). When applications are able to use this information, they will request your consent. We will use this data for the purpose of improving the Service. Please note that photographs or video files uploaded to the Service may contain recorded location information and a device's IP address can sometimes be used to approximate the location of a device.

5. The Service may collect information from or about you in the following ways:
  - When you add information to it (including, for example, information you provide at the time of registering).
  - When your HCP inputs information into it.

## SECURITY OF YOUR INFORMATION

6. The information about you held by the Service is stored on servers within datacentres in the UK and will not be transferred outside the European Economic Area (EEA).
7. All information you provide in using the Service is stored on secure servers and all your sensitive personal information is encrypted using industry standard technology. Access to this information is governed by a password that we have given you (or you have subsequently chosen). **You are responsible for keeping this password safe and you must not share your password with anyone or allow anyone else to access your account.**
8. You must immediately notify us of any unauthorised use of your password or account by emailing [contact-us@mapmyhealth.co.uk](mailto:contact-us@mapmyhealth.co.uk)
9. Certain features of the Service (such as print outs) allow you to make your information public. Please consider carefully what you choose to share or make public. We have no responsibility for your decisions or the consequences of them.

## WHO HAS ACCESS TO YOUR INFORMATION?

10. Those who are able to access your personal information are:

- You; and
- Your HCP

Our employees may access your name and email address for administration purposes only (eg. password resets)

11. Those who are able to access to your sensitive personal information are:

- You; and
- Your HCP

12. The only way to access your sensitive personal information held by the Service is through the Service itself. If you write to us to request a copy of your information, we will only be able to provide you with the non-encrypted personal information that we can access.

13. The only circumstances in which we might hold sensitive personal information outside the encrypted environment of the Service is if you have interacted with us using another contact method, e.g. if you write to us or email us. Please be aware that not all forms of communication are secure and we are not responsible for the security of sensitive personal information you send to us by these means.

14. Please note that in the event there is a change in the healthcare provider organisation which provides your access to the Service, we shall be able to share your information with the new healthcare provider on the same basis as is set out in this privacy policy.

#### **HOW YOUR INFORMATION WILL BE USED**

15. We, and the Service will use your information for the following purposes:

- i. to provide the Service to you;
- ii. to ensure that the Service is presented in the most effective and relevant manner for you and your device;
- iii. to allow you to participate in the interactive features of the Service;
- iv. to create anonymised and/or aggregated information; and
- v. to notify you about changes to the Service.

To manage the Service we may use certain trusted third party companies and individuals to provide, analyse, and improve the Service. These third parties may have access to

anonymised and/or aggregated information for the purposes of performing these tasks but these third parties will not have access to your personal information.

16. We do not sell your personal information to anyone and will not share it without your consent (unless required to do so by law or regulatory authority or in accordance with NHS data policies).
17. We may disclose your information in the following circumstances:
  - Where we access anonymised and/or aggregated information and it is used by us or by third parties including the NHS, other HCPs and academic departments for research purposes (such as understanding the illnesses we are trying to treat, the prevention and management of health issues, informing decisions about public health interventions and health resource planning and improving the Service).
  - If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction, but we will notify you (for example, via email and/or a prominent notice on our Service) of any change in control or use of your personal information, or if your information becomes subject to a different privacy policy. We will also inform you of the choices you may have regarding your information in this situation.
  - As per clause 14 above, where there is a change in the healthcare provider organisation which provides your access to the Service, we shall be able to share your information with the new healthcare provider on the same basis as is set out in this privacy policy.
  - Where required to do so by law or regulatory authority or in accordance with NHS data policies.

## **YOUR RIGHTS TO YOUR INFORMATION**

18. The Act gives you the right to access information held about you. While your account is open you may request access to your information at any time in accordance with clause 12. Once your account has been closed you will only be able to request access during the 12 months following closure of your account. After this time and as set out in Part 5, your information will be deleted. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **DELETION OF INFORMATION IN YOUR ACCOUNT**

19. Although we would much rather you stay, you can stop using the Service at any time.

20. If you choose to close your account on the Service, or if your HCP is no longer using the Service, the encrypted information within your account will be archived and stored encrypted on our servers for up to 12 months. The only way you may access the encrypted information following the closure of your account is to request the account be reinstated. You may request reinstatement of your account in accordance with clause 12 and our terms of use at any time. Once your account is deleted there is no way to retrieve your encrypted personal information.
21. You may request that your account is deleted at any time. The request will be processed immediately. The process of deleting your account takes approximately 5 days and once the process is complete **all information** in your account will permanently and irrevocably be deleted, except for:
- information you have in common with other users (such as communications between you and other users or public posts made by you);
  - anonymised and/or aggregated information that remains after deleting your personal information; and
  - information that had already been anonymised and/or aggregated prior to processing your closure request.

#### **CHANGES TO PRIVACY POLICY**

22. We reserve the right to change our privacy policy. Any changes we may make to our privacy policy will be posted on this page and, where appropriate, notified to you by e-mail.

#### **QUESTIONS**

23. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: [contact-us@mapmyhealth.co.uk](mailto:contact-us@mapmyhealth.co.uk) or Mapmyhealth Limited, 27 Old Gloucester Street, London, WC1N 3AX