

# Terms of use & Privacy

This page explains how you can work with VitruCare and how it helps you do the things you want to do in your life – and take care of your health issues at the same time.

Everyone knows that we are more likely to do something if we really want to do it, not because someone else tells us we should. VitruCare understands how important it is for you to be in the driving seat - as of course you should be.

You can choose things that are important to you and your own ways of achieving them, VitruCare shows how the changes you make to get you there affect your health. You can see clearly how you are doing. Watch your progress by checking an easy-to-understand display that tells you just what you need to know. VitruCare uses the information that you enter and stores it according to the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) guidance.

Your consent is needed before you can proceed to use the VitruCare service. Your consent can easily be withdrawn at any time if you wish. The VitruCare service will adhere strictly to the UK GDPR guidance and be very careful with your personal data, so please read our privacy policy before giving your agreement below:

**You can use the VitruCare service** – to add your personal information, create new content, share information with your consent, and communicate with your doctor and other people using the VitruCare service. As you use the service, we want you to be clear how we are using information and the ways in which you can protect your privacy. Your privacy is very important so please take time to read the information below and contact us by using [this contact form](#) if you have any questions.

This policy below explains how the VitruCare Service collects your information and how it is used, updated and stored. Once you have read it, please click the box to confirm your agreement. You can withdraw your consent at any time.

## Privacy Policy

This Privacy Policy applies to Dynamic Health Systems Services Ltd and any services provided by us. This policy and any other documents referred to on 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. Please read the following carefully to understand our views and practises regarding your personal data and how we will treat it.

### You are in control and choose what is right for you

People have different privacy concerns. VitruCare will be clear about what information is being collected and you have the choice to decide how you would like it to be used. For example, you can review your information, edit your preferences, and control the information you are sharing with others.

### Information that is collected when using the VitruCare service

For the VitruCare service to help you, information regarding your conditions is collected from your medical record and transferred into VitruCare. You have already discussed this with your doctor and agreed to this transfer of information. We use this information to display your health information in a simple way to guide you in taking control of your health. VitruCare service will collect information that you input so that you can see the changes you are making to your health. When you confirm your agreement to use VitruCare we will collect some of your personal information such as your name, email address, telephone number as well as the medical information (such as diagnoses, blood test results, medical measurements such as blood pressure) transferred from your medical record to help you look after yourself better. You may want to add a photo of yourself or someone else, but you are in control in making these decisions. To take advantage of all the VitruCare facilities including sharing information with people you would like to, such as your doctor, nurse, family member or people who have similar conditions such as you, this is also under your control. We will also collect information about how you are using the VitruCare service for example, by computer, smartphone or the television. This is important so we can tailor the service as needed for your purpose and make sure VitruCare interacts with you in the best possible way and ensure the right information is delivered to you by the VitruCare service

## How information is used by VitruCare

Information collected by using the VitruCare service will be used to interact with you and enable better self-care. It will also be used to improve the VitruCare and NHS services through research and development, and tailor the content provided to you, so that you benefit the most from the service. When you contact VitruCare for help, if this is needed, we may keep a record of your communication to help resolve any issues that you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements. VitruCare will use information to improve your experience and overall quality of the VitruCare service. For example, by knowing your language preferences, the VitruCare service can be used in your preferred language and when you require information about your condition VitruCare can provide the right information to you, in the way you like it being presented.

## Information that you share

The VitruCare service allows sharing of information in a secure environment so it cannot be seen by anyone other than the person it is intended for. An example of this is when you share information or ask a question of your health care professional. VitruCare also enables you to send information to a section of the users of VitruCare who may share the same conditions as you if you would like to. This may be in the form of messages, emails or video content. You can decide how and whether you would like to do this.

## Sharing your information

VitruCare will not share personal information with companies, organisations and an individual outside the service unless you provide consent to do so or the information is requested for legal reasons that the law permits. We may disclose your personal information to third parties: If we sell or buy any business or assets, in which case we may need to disclose your personal data to the prospective seller or buyer of the business or assets. If the VitruCare service is involved in a merger, acquisition or asset sale, we will give affected users notice before personal information is transferred or becomes subject to a different privacy policy. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety, of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. VitruCare may share aggregated, pseudonymised information publicly, to show trends about the general use of our services and research purposes.

# Information security

We wish to protect VitruCare and our users from unauthorised access to or unauthorised alteration, disclosure, or destruction of information that we hold. VitruCare has several safety features to protect your privacy. VitruCare processes personal information on our secure facilities and servers in the UK and in other countries.

## Access to information

The Data Protection Act (2018) gives you the right to access information held about you. 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.

## UK GDPR and Transparency

The following is included as a key requirement of the UK GDPR.

### **Name and contact details of the organisation**

DYNAMIC HEALTH SYSTEMS SERVICES LTD, (DHS) incorporated and registered in England with company number 07487762 whose registered office is at York House, Cottingley, Business Park, Bradford, BD16 1PE.

### **The purposes of processing**

Please see 'How information is used by VitruCare' above.

### **The lawful basis for processing**

Your data will only be processed if at least one of the following applies:

1. the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
2. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
3. processing is necessary for compliance with a legal obligation to which the controller is subject;
4. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
5. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
6. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

## **The legitimate interests for the processing**

At all times legitimate interests for data processing will be balanced such that the necessity of processing the personal data is weighed against the interests, rights and freedoms of the individual considering the circumstances.

## **The categories of personal data obtained**

See information collected when using VitruCare above. As a data processor DHS will process data on behalf of the data controller to meet the requirements of the Data Protection Act 2018 and the UK GDPR and ensure the protection of the rights of the data subject.

## **The details of transfers of the personal data to any third countries or international organisations**

No personal data will be transferred to third countries or international organisations

## **The retention periods of the personal data**

As per UK GDPR requirements, personal data must be kept “no longer than is necessary for the purposes for which the personal data are processed”

## **The rights available to individuals in respect of processing**

The following rights are available to individuals:

1. **The right of access to data.** The individual has the right to know whether data concerning him or her are being processed and has access to it.
2. **The right to rectification.** When personal data are inaccurate, then controllers need to inform the processor to make corrections.
3. **The right to erasure or right to be forgotten.** An individual can make this request verbally or in writing to the data controller.
4. **The right to restriction of processing.** The individual can limit the processing of their personal data at any time.
5. **The right to be informed.** The data controller would perform this.
6. **The right to data portability.** The individual can request this via the data controller.
7. **The right to object.** Individuals can say they don't want the personal data processing to be done.
8. **The right not to be subject to a decision based solely on automated processing,** including profiling, which produces legal effects concerning him or her or similarly significantly them.

## **The right to withdraw consent**

Any individual can withdraw their consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the individual will be informed that it is just as easy to withdraw as to give consent.

## **The right to lodge a complaint with a supervisory authority**

Every individual has the right to lodge a complaint with a supervisory authority.

## **The source of the personal data**

See ‘information collected when using the VitruCare service’ above.

**The details of whether individuals are under a statutory or contractual obligation to provide personal data**

The VitruCare service cannot be used if personal data is not provided by the individual or the data controller

**The details of the existence of automated decision-making, including profiling.**

See 'How information is used by VitruCare' above.

## Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail or in writing.

## Contact

Questions, comments and requests regarding this privacy policy are welcomed. Please [click here](#) to go to the contact page on the Dynamic Health Systems website.

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at <https://dynamichealthsystems.co.uk/contact/>.

#### Name and contact details of the Data Protection Officer

If you are concerned about how your data is being used, in the first instance, please contact the DPO – Douglas Muir, who can be contacted at: <https://dynamichealthsystems.co.uk/contact/>

You can also complain to the Information Commissioner's Office (ICO) if you remain unhappy with how we have used your data, at the following address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

## Human slavery and human trafficking

**DHS is vehemently opposed to any form of human slavery and human trafficking, and committed to improving our practices to combat human slavery and human trafficking at all times.** We recognise that slavery and human trafficking is a real yet hidden issue in our society. We will not tolerate slavery and human trafficking in our business or supply chain.