

PRIVACY POLICY- ISOSCONNECT

Welcome to Isosconnect. This website, Isosconnect.com (**our site**), is brought to you by Chrysalis Health Ltd trading as Isosconnect, of 20 – 22 Wenlock Road, London, England, N1 7GU. We take the privacy of our users very seriously.

We ask that you read this Privacy Policy carefully as it contains important information about how we will process your personal data as a user of our site. It does not cover any website you have used to access our website or any website that you access from it.

By submitting your personal information to us, you consent to the use of that information as set out in this policy.

Separate privacy policies may apply to use of our other sites or products, or in respect of any of your personal data which we process where you are one of our suppliers (or as an employee or representative of same), visit our premises, or otherwise engage with us separately from use of our site.

For the purposes of data protection legislation, Chrysalis Health Ltd (an English company with registered number 10302338) trading as Isosconnect (**we** or **us**) is the 'data controller' of the information described in this Privacy Policy (i.e. the company who is responsible for, and controls the processing of, your personal data).

This version 1 of this Privacy Policy was last updated on 14 September 2020.

Personal data we may collect about you

Consumer Users

If you are a consumer user, where we implement features which allow you to register directly to use our site, we may directly obtain and process personal data about you such as your name, username, address, phone number, email address and other contact details when you register for our service or book a consultation with one of the health and wellness professionals who use the site (**Professionals**). We may also collect data from you when you complete the online questionnaire we make available to you in advance of your first consultation with a Professional.

This information will be collected directly by us and processed by us in our capacity as a data controller.

We may also obtain medical information or other personal information (including name, date of birth, gender, email address, mobile number and address) relating to you as a consumer user where it is available in the clinical notes taken by of any consultation between consumer users and Professionals, and Professionals have used our site to record such information, including contemporaneously when facilitating calls by video conference.

The responsible data controller of all such personal data is the Professional, who is responsible for the ensuring that there are lawful grounds on which your medical

information or other potential special category data will be processed by us as a data processor, which will typically be on the basis of your consent. We require all Professionals to provide consumer users with their own privacy policy regarding how they process and secure personal data of the consumer user, and to ensure that there are valid grounds for our processing your personal data as a data processor.

All of this information will be stored on password cloud-based servers and only accessible to the relevant staff or software providers.

Professionals

If you are a Professional, we will obtain personal data about you such as your name, qualifications, field of practice, address, phone number, email address and other details that will be specified to you at the point of collection / entry when you register for our service or book a consultation with a consumer user.

All Users

We will obtain your personal data when you send us feedback or contact us for any reason. We may also obtain sensitive personal data about you if you volunteer it during the completion of a form on the website. If you volunteer such information, you will be consenting to our processing it for the purpose of our providing the service.

We may monitor your use of our site through the use of cookies and similar tracking devices. For example, we may monitor how many times you visit, which pages you go to, traffic data, and location data. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. For further information on our use of cookies, please see our [Cookie Policy](#).

Save as collected by a Professional and uploaded to our sites (in relation to appointments with consumer users) we do not collect any **Special Categories of Personal Data** about you (including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data or information on your criminal convictions and offences), either as a consumer user of our site or as a Professional.

Payment Data

We do not store credit card details, nor do we share financial details with any third parties. All payments made on our site will be processed by a third-party credit card processor, Stripe, which encrypts all payment transactions. All such transactions will be governed by their applicable terms and conditions and privacy policy available at <https://www.stripecenter.com/privacy-policy/>.

How we use your personal data

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 perform the contract we are about to enter into or have entered into with you, to keep internal records for administration purposes related to such contracts and for the purposes contemplated in any separate terms of use for our website that you have entered into;
- 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.

Generally, we do not rely on consent as a legal basis for processing your personal data other as set out below in relation to marketing.

More specifically, if you are a consumer user, we will use your personal data for the following purposes:

- facilitating a consultation with a Professional or a team of professionals you engage through our site;
- sharing your online questionnaire responses with Professionals with whom you booked a consultation. These will include your height, weight, and any issues which are causing you concern, and which have led you to seek a consultation with a Professional;
- to facilitate your payments to Professionals (for the avoidance of doubt, and as outlined in our separate consumer terms and Professional terms, we are not a party to any such transactions, and are not responsible or liable for either party adhering to its contractual or legal obligations to the other. Any payment platform account will be registered in the name of the relevant Professional or their organisation, rather than in our name (although our platform will facilitate this));
- storing your medical information or other data (including Professionals notes taken from or at video consultations facilitated through our site) where Professionals have used our site to record or store same, and making such information available to any anyone permitted to access such user accounts by the relevant Professional, to facilitate the provision of services by the Professional to you, and otherwise as instructed in writing by the Professional as the relevant data controller in respect of such data;
- to help us identify you and any accounts you hold with us;
- administration;
- research, statistical analysis and behavioural analysis;
- customer profiling and analysing your purchasing preferences;
- marketing—see ‘Marketing and opting out’, below;
- fraud prevention and detection;
- customising our site and its content to your particular preferences;
- to display on our site (including associated sites) and social media accounts any testimonial you may provide to us;
- to notify you of any changes to our site or to our services that may affect you; and
- improving our services.

If you are a Professional, we will use your personal data for the following purposes:

- facilitating a consultation with a consumer user;
- facilitating co-operation with other members of a consultation team you join on our site;
- billing you (if applicable) or otherwise exercising our rights and discharging our obligations under any contract we have with you;

- to help us identify you and any accounts you hold with us;
- administration;
- research, statistical analysis and behavioural analysis;
- customer profiling and analysing your purchasing preferences;
- promoting and marketing your participation in Isosconnect, including by means of our Facebook, Twitter and Instagram social media accounts;
- marketing—see ‘Marketing and opting out’, below;
- fraud prevention and detection;
- customising our site and its content to your particular preferences;
- to notify you of any changes to our site or to our services that may affect you; and
- improving our services.

Marketing and opting out

If you have given permission, we may contact you by SMS or email about products we think may be of interest to you. If you prefer not to receive any direct marketing communications from us, you can opt out at any time. For more details see ‘Your rights’, below.

Disclosure of your personal data

We may disclose your personal data as follows:

- (if you are a consumer user) to Professionals with whom you have engaged (or anyone permitted by the Professional to access such user accounts) for the purposes of providing our services to you (where you have registered with us), and to facilitate them providing their consultation service to you (whether or not you have registered with us). If applicable, where you engage consultation services from a collective team of Professionals (using functionality available on our site) those notes will be visible to each Professional member of the team, not just the Professional whose session the notes or results relate to. This feature is optional and requires you to have registered with us directly;
- (if you are a professional) to consumer users to promote your services and facilitate bookings and consultation services;
- The provider of our video call service, Amazon Chime. Amazon Chime will have access to your video consultation sessions. Amazon Chime’s Privacy Policy is available for review at: <https://aws.amazon.com/privacy/>
- our agents and service providers (including our payment services provider, Stripe, and Amazon Web Services, who hosts our user account data, and whose privacy policy is available at: <https://aws.amazon.com/privacy/>
- if required to do so, the General Medical Council, Care Quality Commission or any other applicable health or wellness regulatory body with relevant jurisdiction; and
- If our business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

Keeping your data secure

We will use technical and organisational measures to safeguard your personal data, for example:

- access to your account is controlled by a password and username that are unique to you; and
- we store your personal data on secure servers.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. It remains your responsibility to:

- Ensure nobody else will use our website while you are logged into your account (we advise our users to take extra care when using public computers/devices and to NOT leave themselves logged in; it is your responsibility to ensure this does not happen);
- Log out and exit your account on Isosconnect when you are not using it, on any private and/or public computer or device; and
- Keep your password and any account details or access details secret and to yourself.

Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

Information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her personal data;
- receive on his/her behalf any data protection notices;
- give consent to the transfer of his/her personal data abroad; and
- give consent to the processing of his/her health data.

Links to Other Sites

Our website does and may contain links to other websites, including websites of Professionals. This privacy policy applies only to our website (www.isosconnect.com) so when you visit other websites please read their privacy policies, as we cannot accept any responsibility for breaches or issues you may have in relation to privacy once you leave our website.

Retention of Your Data

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy.

More specifically we expect to keep personal information relating to customers where we act as a data processor for as long as the relevant Professional who acts as a data controller maintains an account with us, and typically for a period of 6 months thereafter (although we reserve a right to delete such data more quickly).

Where we have collected your personal information directly where you have registered to use the site or subscribed for marketing communications from us, we will store your data for as long as you have an account with us / have opted into such communications, and typically for a period of 6 months thereafter (although we reserve a right to delete such data more quickly).

Your rights

You have the right, subject to the payment of a small fee, to request access to personal data that we may process about you.

You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right, you should:

- put your request in writing;
- provide us with enough information to identify you (e.g., account number, username, registration details); and
- specify the information that is incorrect and what it should be replaced with.

You can access, correct, update or request deletion of your personal information at any time, either through your online account or by contacting us. Deletion of data will be carried out on the understanding that removal of some information (e.g., addresses) during an active membership term may negatively affect your ability to use the site.

We cannot delete any billing data, which is kept for tax purposes.

You can request that we restrict processing of your personal information, object to processing of your information or request portability of your personal information. For these requests please email us at privacy@isosconnect.com. We will comply with your request where your rights have been exercised in accordance with applicable laws.

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You also have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right, you should:

- put your request in writing (an email sent to privacy@isosconnect.com with a header that says 'Unsubscribe' is acceptable);

- provide us with enough information to identify you (e.g., account number, username, registration details); and
- if your objection is not to direct marketing in general, but to direct marketing by a particular channel (e.g., email or telephone), please specify the channel you are objecting to.

Our contact details

We welcome your feedback and questions. If you wish to contact us, please send an email to privacy@isosconnect.com.

Changes to privacy policy

We keep our privacy policy under regular review. If we change our privacy policy we will post the changes on this page, and place notices on other areas of the site, so that you may be aware of the information we collect and how we use it at all times.

Complaints to the Information Commissioner's Office ('ICO')

If you make a complaint to us and think we have not dealt with it to your satisfaction, you may send your complaint to the Information Commissioner for investigation. For more information on the Information Commissioner, and how to make a complaint, please visit their website at www.ico.org.uk.

We would appreciate the chance to deal with your concerns before you approach the ICO so would ask that you please contact us in the first instance.