



ConsultTed

The Pharmacy Consultation App



CONSULTTED WEBSITE PRIVACY POLICY

INTRODUCTION

This privacy policy sets out how ConsultTed uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a copy of the policy here: **[Insert LINK from website that can be downloaded]**.

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1. IMPORTANT INFORMATION AND WHO WE ARE

Who we are

ConsultTed is a trading name of Health Tech Horizons Ltd **'we'** or **'us'** or **'our'**. We are a company incorporated in Northern Ireland with company registration number



NI719472 and registered office at The Amp Growth Incubator, 11 Ebrington Square, Londonderry, Northern Ireland BT47 6FA

Privacy policy

This privacy policy gives you information about how ConsultTed collects and uses your personal data through your use of this website and the ConsultTed platform, including any data you may provide when you register your details with a pharmacy which uses our ConsultTed platform to input your details and assess your needs.

This website is not intended for users under 16 years of age and we do not knowingly collect data relating to users under 16 years old.

Controller

Both the pharmacy through whom you registered and we are the controllers and we are the people responsible for your personal data (collectively referred to as 'joint controllers' in this privacy policy). Please refer to the privacy policy of the pharmacy through whom you registered for details of its data protection policies.

Clinical services and medical decision-making are provided exclusively by participating pharmacies and their licensed clinicians. We act solely as a technology provider and are responsible for the operation, hosting, and security of the ConsultTed platform, and do not influence or control clinical judgment.

2. THE TYPES OF PERSONAL DATA COLLECTED ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

Different kinds of personal data about you may be collected, used, stored and transferred. We have grouped this personal data together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, title, date of birth, health and care number and gender.
- **Contact Data** includes home address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use this website.



- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Health Data** includes details about the symptoms you are suffering. If appropriate, information about medicine you have been supplied, or reasons why you require onward referral to your GP.

We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

3. **HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms, registering with a pharmacy to use ConsutTed or by corresponding with us by post, phone, email, app notifications or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - participate in a survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [**Insert Cookie Policy LINK here**] for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:
 - Technical Data is collected from analytics providers such as Google and Google Search Console based outside the UK; Elementor CAPTCHA and
 - Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services such as Gravity Forms Stripe, Inc based outside the UK and Zoho CRM.



4. HOW WE USE YOUR PERSONAL DATA

LEGAL BASIS

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Your personal data will be retained in the pharmacy and ConsultTed for a period of eight years after the conclusion of treatment for adults; for young people aged 16-17 at the conclusion of treatment, the data will be kept until the patient’s 26th birthday. HSCB & BSO as health-care organisations hold information in line with the Department of Health Retention Policy identified in the document ‘Good management, Good Records’ which can be viewed at Department of Health’s Good Management, Good Records Section M, outlines the requirements for retention and disposal of community pharmacy held records: <https://www.health-ni.gov.uk/sites/default/files/publications/health/gmgr-disposal-schedule.pdf>

Purpose/Use	Type of data	Legal basis
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<p>To register you as a new user</p>	<p>(a) Identity (b) Contact</p>	<p>Delivery of the ConsultTed service to you have signed up for (consent).</p>
<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Search the ConsultTed database for details of medicines and treatment plans which may suit your needs</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Special Category Data (Health Data)</p>	<p>(a) Delivery of the ConsultTed service to you have signed up for, for example to record your health concerns, symptoms and medicine already using.</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us).</p> <p>Further lawful basis:</p> <p>Processing is necessary for the purposes of preventative or occupational medicine.</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Dealing with your requests, complaints and queries</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (f) Special Category Data (Health Data)</p>	<p>(a) Delivery of the ConsultTed service to you have signed up for.</p> <p>(b) Necessary to comply with a legal obligation.</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you).</p> <p>Further lawful basis:</p> <p>Processing is necessary for the purposes of preventative or occupational medicine.</p>
<p>To enable you to complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Special Category Data (Health Data)</p>	<p>(a) Delivery of the ConsultTed service to you have signed up for.</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).</p> <p>Further lawful basis:</p> <p>Processing is necessary for the purposes of preventative or occupational medicine.</p>



<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical (f) Special Category Data (Health Data)</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation Further lawful basis: Processing is necessary for the purposes of preventative or occupational medicine.</p>
<p>To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical (f) Special Category Data (Health Data)</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) Further lawful basis: Processing is necessary for the purposes of preventative or occupational medicine.</p>
<p>To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR Consent, having obtained your prior consent to receiving direct marketing communications</p>



	(f) Marketing and Communications (f) Special Category Data (Health Data)	Further lawful basis: Processing is necessary for the purposes of preventative or occupational medicine.
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services). Further lawful basis: Processing is necessary for the purposes of preventative or occupational medicine.

6. DIRECT MARKETING

During the registration process on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from ConsultTed via email, sms, in-app notifications, telephone, post.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

7. OPTING OUT OF MARKETING

You can ask to stop sending you marketing communications at any by following the opt-out links within any marketing communication sent to you or by contacting us at info@consultted.com

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

8. COOKIES

For more information about the cookies we use and how to change your cookie preferences, please see [\[Insert LINK TO YOUR COOKIE POLICY\]](#).



9. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- Your GP practice to help them provide care for you.
- The Health and Social Care Board (HSCB) for service evaluation and audit.
- The HSCB and the Business Services Organisation (BSO), for the purposes of administering and managing health and social care services and to verify that the service has been delivered by the pharmacy as part of post-payment verification.
- With other pharmacies who have an account with ConsultTed and to whom you have asked for your personal data to be communicated for further consultation purposes.
- With payment services providers for the purposes of collecting payment for example for subscribing to the ConsultTed platform.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

10. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the UK and Ireland.

11. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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



12. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

Details of retention periods for different aspects of your personal data are set out next to the table **Purposes for which we will use your personal data** above.

13. YOUR LEGAL RIGHTS

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 7 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that



this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 5 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact info@consultted.com.

14. NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

15. WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



16. TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

17. CONTACT DETAILS

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: info@consultted.co.uk
- Postal address: The Amp Growth Incubator, 11 Ebrington Square, Londonderry, BT47 6FA

18. COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

19. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on 09/12/2024.

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, for example a new address or email address.

20. THIRD-PARTY LINKS

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 policy of every website you visit.