

PRIVACY NOTICE FLORENCE TELEHEALTH SERVICES

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INTRODUCTION

Florence is owned and operated by Mediaburst Limited, ("Mediaburst", "we", "us", "our"). We are committed to protecting and respecting your privacy. Mediaburst processes your personal data in line with the data protection principles set out in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019, SI 2019/419 ("UK GDPR") and the Data Protection Act 2018.

Florence works in partnership with GP Practices and NHS Trusts across the UK to collect health readings of patients that use our telehealth application. Patient health data is shared with your doctor and other authorised medical clinicians to help improve the quality of care you receive.

This privacy notice explains what personal data Mediaburst collects from individuals (patients and clinicians) ("you/your") who use Florence, visit the Florence website (www.getflorence.co.uk), contact us using our web forms, by email, phone or through one of our social channels; or other communications.

We place great importance on ensuring the quality, confidentiality, integrity, and availability of the data we hold, and in meeting our data protection obligations when processing personal data. Mediaburst is committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.



If you have applied for a job with Mediaburst or submitted your CV (or similar employment information) to us, we process your personal data as set out in our privacy notice for recruitment candidates. You will be able to find this on the www.getflorence.co.uk website.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this privacy notice periodically to check for updates.

WHAT INFORMATION DO WE PROCESS?

We process all information you give us, either through forms on our website www.getflorence.co.uk (our site) or by corresponding with us by telephone, email or otherwise. This includes information you provide when you register to use our site, subscribe to a service, or when you report a problem with our telehealth application or website.

Information processed following an initial enquiry from a healthcare professional We process the following information:

- Name
- GP surgery / network, NHS Trust or Business name
- GP surgery / network, NHS Trust or Business address
- Job title/position
- Organisation telephone number
- Organisation email address

Information you provide to us when registering with and using Florence as a patient

The personal data and sensitive data collected and processed as part of the agreement for using Florence, as well as to ensure accounts are accessible to the users the information/data collected includes;

- NHS number
- Full name
- Mobile phone number.
- Health data readings, such as blood pressure, weight, medication, etc.

Information you provide to us when using Florence as a registered clinician



The personal data collected and processed as part of the agreement for using Florence, as well as to ensure accounts are accessible to the users the information/data collected includes:

- Full name
- NHS email address
- Healthcare organisation name and address
- Mobile phone number

Information processed when you visit our website - Cookies

Florence uses cookies on our website. Cookies are small text files that are downloaded to your device when you visit a website. We use cookies to remember your preferences, display content that is more relevant to you and improve your overall experience of our site. The cookies we use are listed below. You can learn more about cookies by going to http://www.allaboutcookies.org/.

Domain	Cookie Name	Description	Duration
Getflorence.co.uk	_ga	Monitors the use and performance of our website –distinguishes unique users by assigning a randomly generated number	2 years
Getflorence.co.uk	_gat	Used by Google Analytics to throttle request rate	1 day
Getflorence.co.uk	_gid	Used to distinguish users on Google Analytics in order to count user visits and traffic sources so that we can measure and improve the site performance	1 day

MANAGING COOKIES

You can manage and delete cookies and web beacons through your web browser. Each browser manages cookies differently, but you can learn more about cookie settings in the most common browsers using the links below:

- Chrome
- Firefox
- Safari for Mac
- Safari for iOS
- Edge
- Internet Explorer



Our website may contain links to other websites. This privacy notice only applies to this website, so please read the privacy notices provided by the other websites before posting any personal information.

PURPOSES AND BASES FROR PROCESSING YOUR DATA

We may use your data for the following purposes and on the following lawful bases:

Purpose	Lawful Bases for Processing
Responding to correspondence from you.	It is in our legitimate interest to respond to
	enquiries made via our website, by email,
	through our social channels or any other
	means.
Sending you information such as our	When you agree to be contacted for
newsletter, research reports, insights and	information about Florence we will rely on
other Florence news and information which	your consent, which may be withdrawn at
may be of interest.	any time by contacting us.
Collecting and sharing patient medical or	We process your medical or health data on
health data with registered clinicians using	behalf of the healthcare organisation (data
the Florence telehealth application.	controller) with your explicit consent, which
	may be withdrawn at any time by contacting
	us.
Fulfilment of our obligations, as set out in	This is necessary for the performance of the
our agreement of services with the	contract we have entered with the data
healthcare organisation (the data	controller.
controller).	
Service management, forecasting and	It is our legitimate interest to identify areas
statistical purposes.	for managing current business
	relationships, develop new products and
	services, and for managing our business.
Improving our website and the overall	It is our legitimate interest to allow analytics
website visitor and user experience.	and search engine providers to help
	improve and optimise our website.
	We use analytical cookies on our website
	with your consent, which may be withdrawn
	at any time by contacting us.



SHARING YOUR INFORMATION

It is possible that we may be required to share your data to comply with applicable laws or with valid legal processes, in response to a court order or with government or law enforcement agencies, such as the local council or the police. The legal basis in these cases is compliance with a legal obligation.

INTERNATIONAL TRANSFERS

Florence only operates in the UK. Where appropriate, we may share your data with third party service providers, including those in countries outside the UK, where the data protection laws are not equivalent to those in the UK. We do so using the Standard Contractual Clauses approved by the European Commission and recognised by the UK, on the basis of which data can be transferred outside the UK. The Standard Contractual Clauses oblige the organisations in those countries to comply with the same data protection standards as required in the UK. More information about these is available <a href="https://example.com/here-countries-need-com/here-countries-com/here-countries-com/here-countries-com/here-countries-com/here-countries-com/here-countries-com/here-countries-com/here-countries-com/here-countries-countries-com/here-countries-countr

YOUR RIGHTS

You have certain rights in relation to the processing of your personal data, including to:

- Request access to personal data about you (commonly known as a "data 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 rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request personal data provided by you to be transferred in machine-readable format ("data portability").
- Request erasure of personal data. 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 personal data where you have exercised
 your right to object to processing (see below).
- Request the restriction of processing of your personal data. This enables you to ask
 us to suspend the processing of personal data about you (e.g. if you want us to
 establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right
 may apply where the processing of your personal data is based on the legitimate
 interests of Mediaburst.



These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the laws and regulations to which we are subject. If at any time you decide that you no longer wish to be contacted, or if you would like to exercise any of your rights as set out above, you can contact us by email (hello@mediaburst.co.uk).

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the <u>Information Commissioner's Office</u> if you are concerned about the way in which we are handling your personal data.

DATA RETENTION PERIOD

We will retain your personal data for as long as it necessary for the purpose of our relationship, as instructed by the data controller or until you object to us processing it or withdraw your consent. The data retention period as reflected in the T&Cs for Mediaburst is 5 years.

CONTACT

You can contact us in relation to data protection and this privacy notice by writing to:

CEO.

Mediaburst Limited

Mercury House,

117 Waterloo Road.

London SE1 8UL.

Alternatively, you can email us at hello@mediaburst.co.uk.