



# Privacy Policy

Last Updated May 25, 2018

Medrec.io takes privacy and data protection seriously and seeks to comply with all applicable data protection requirements, including the European Union's General Data Protection Regulation (GDPR).

This Privacy Statement describes who we are, how we collect and use your personal data and how we share that data. It also sets out your rights under data protection law in relation to our processing of your personal data.

If you want more information, or if you have any questions about this Privacy Statement, please get in touch with us using the contact details set out below or by email at [connect@medrec.io](mailto:connect@medrec.io)

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## Who we are

Medrec.io is a company with a vision to help create a connected health care experience by empowering citizens to manage their own health data.

Our standards based technological solutions enable existing medical software providers and medtech companies to expose their data in a consent driven,



secure and standards-based way enabling interoperability. Our innovative solutions also include a patient data management platform, allowing citizens to manage secure sharing of relevant data to third parties as deemed appropriate by the citizen.

We fundamentally believe in empowering citizens to own the single central view of all their medical data.

Our headquarters is Unit 3b North Point House, North Point Business Park, New Mallow Road, Cork.

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## Your medrec.io account

### **Your profile**

Your profile is used to manage the consented access to your medical data. Only you can change these conditions. Only identified and authenticated individuals will have consented access as specified in your profile.

### **Your emergency medical profile**

Your emergency medical profile is part of your profile and follows the same rules as your profile. This profile is only used in the context of a medical emergency.

### **Your medical data**



Your emergency medical data is your data. Only you, and the people you consent to have access to the data through your profile can access this data.

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## Information we collect

### **We collect your biographical data**

We collect the following biographical data: name, address, phone number, email address, and profile pictures.

### **We collect your payment data**

If you purchase solutions from medrec.io, we will need to collect your card details from you to process your payment.

### **We collect data from your interactions with us**

If you interact with us we will record details of those interactions. For example, we will collect details of phone calls, email correspondence and hard copy correspondence.

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## Where we get your personal data



We will collect personal data from you when you interact with us, for example if you register for an account, request information, use our services (including our websites) or purchase our products.

Sometimes we will obtain your personal data from others, including your patients or your medical provider. For example, your patient may provide us with your data in their profile indicating their intent to register you as a provider of their medical data. Medical providers may provide your medical data to your medrec.io account based on your recorded consent.

In addition, our servers, logs and other technologies automatically collect certain information to help us administer, protect and improve our services, analyse usage and improve users' experiences.

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## How we use your personal data

### **We will process your personal data based on your consent**

If you consent to us sending your medical data to a specific provider, we will process your personal data to send this information to your provider.

You can withdraw your consent to the processing of your personal data at any time.



When you visit our website you will be asked to consent to the placement of cookies on your device. You do not have to accept our cookies but if you don't your experience may not be as fulfilling as it would otherwise be.

**We will process your personal data where the processing is necessary for the performance of our contract with you or to take steps at your request before entering a contract**

We will collect and process biographical personal data from you, namely your name, telephone number, address, email address and IP address in order to provide our products and services to you and perform our contract with you. Where the contract is one for paid products or services we will also collect your credit or debit card details.

We will use this data to ensure that we know who you are and that we comply with our obligations under the contract. More specifically we will use this data to:

- manage and administer your account or other products and services that we provide to you
- establish your eligibility for access to data
- process payments that are paid by you



- contact you by post, phone, text message, email, social media, or fax using our online website or other means
- monitor and record our conversations when we speak to you on the telephone (for example, to check your instructions to us, to analyse, to assess and improve customer service and for training and quality purposes)
- manage and respond to a complaint or appeal
- keep proper records

### **We will process your personal data when we have a legitimate interest in doing so**

At times we will need to process your data to pursue our legitimate business interests, for example for administrative purposes, to provide information to you, to operate, evaluate, maintain, develop and improve our websites and services or to maintain their security. We will not process your data on a legitimate interest basis where the impact of the processing on your interests and rights outweigh our legitimate interests.

We will process the following personal data based on our legitimate interests:

- data about how you use our website and services for analysing the use of the website and services



- data relating to your account for operating our services, including identification information to ensure security of our platform and services.
- data included in your personal profile on our website to enable and monitor your use of our website, platform and services.
- data you submit to us relating to an enquiry about our products and services

If do not want us to process your personal data based on our legitimate interests, let us know and we will check to make sure that our interests in processing your personal data don't outweigh your interests and rights.

### **We will process your personal data to comply with our legal and regulatory obligations**

We may need to use your information to comply with legal and regulatory obligations, including complying with your information rights, with reporting obligations and with court orders. We may also need to process your personal data to protect your vital interests or those of another person.

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## **What you can do with your information**



## **You can ask for access to the information we hold on you**

You have the right to ask for all the information we have about you and the services you receive from us. When we receive a request from you, we must give you access to everything we've recorded about you as well as details of the processing, the categories of personal data concerned and the recipients of the personal data.

We will provide you with a copy of your personal data free of charge.

## **You can ask to change information you think is inaccurate**

You should let us know if you disagree with something included in your personal data.

We may not always be able to change or remove that information but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

## **You can ask to delete information (right to be forgotten)**

In some circumstances you can ask for your personal information to be deleted, for example, where:

- your personal information is no longer needed for the reason it was originally collected

**You have several rights to control the personal data we use and how we use it. This includes the right to access your personal data, rectify inaccuracies, request that your data be deleted, restrict and/or object to the processing of your data and transfer your personal data to other entities. You may exercise these rights by contacting us via email at**

**[connect@medrec.io](mailto:connect@medrec.io)**





- you have removed your consent for us to hold or use your information (where there is no other legal reason us to hold or use it)
- there is no legal reason for the holding or use of your information
- deleting the information is a legal requirement

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- we're required to have it by law
- it is used for freedom of expression
- it is used for public interest purposes
- it is for scientific or historical research or statistical purposes where deleting the data would make it difficult or impossible to achieve the objectives of the processing
- it is necessary for legal claims.

**You can ask us to limit what we use your personal data for**



You have the right to ask us to restrict what we use your personal data for where:

- you have identified inaccurate information, and have told us of it
- where we have no legal reason to hold or use that information, but you want us to restrict what we use it for rather than erase the information altogether

When personal data is restricted it can't be used other than to securely store the data and with your consent to handle legal claims and protect others, or where it's for important public interests.

Where restriction of use has been granted, we'll inform you before we carry on using your personal data.

You have the right to ask us to stop holding or using your personal data for any of our services. Where possible we'll seek to comply with your request, but we may need to hold or use data because we are required to by law. You should also be aware that if your request is approved this may cause delays or prevent us delivering that service.

**You can ask to have your personal data moved to another provider (data portability)**



You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

This right only applies if we're using your personal information with consent and if decisions were made by a computer and not a human being. It does not apply where it would adversely affect the rights and freedoms of others.

### **You can make a complaint**

You have the right to lodge a complaint with the local supervisory authority for data protection in the EU member state where you usually reside, where you work or where you think an infringement of data protection law took place.

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## How long do we keep your personal data

If your account lapses, we will retain your account data for three years following the date of last encounter unless directed to do otherwise by you. At the end of this three-year period, we will remove this data from our systems.

**We only keep your data as long as it is necessary for the purposes of processing it or to comply with legal**



In some circumstances it is not possible for us to specify in advance the period for which we will retain your personal data. In such cases we will determine the appropriate retention period based on balancing your rights against, public health interests and our legitimate business interests.

**or regulatory requirements.**

We will always retain your personal data where this is necessary for compliance with a legal obligation to which we are subject or to protect your vital interests or those of another person.

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## Security

We update and test our security technology on an ongoing basis. We restrict access to your personal data. Only those authorized through your explicit consent will have access to your personal information. We also train our employees about the importance of confidentiality and maintaining the privacy and security of your information.

**We are committed to protecting the security of your personal information and have implemented appropriate physical, technical and administrative safeguards.**

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## Transfers outside the EEA



If we transfer personal data to the US, we rely on the Standard Contractual Clauses under Article 46.2 of the GDPR

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## Amendments to this Privacy Statement

We will post any changes on the website and when doing so will change the updated date at the top of this privacy notice. Please make sure to check the date when you use our services to see if there have been any changes since you last used those services. If you are not happy with any changes that we have made you can email us at [connect@medrec.io](mailto:connect@medrec.io).

**We may change this Privacy Statement from time to time.**

In some cases we may provide you with additional notice of changes to this privacy statement, such as via email. We will always provide you with such additional notice well in advance of the changes taking effect where we consider the changes to be material.

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## Who receives your Personal Data

**We share personal data with participating providers, based on consent access provided in your profile**

**We share your information with the third-party providers that you explicitly consent**



We will share your personal data with specific providers based on the consent access control specified in your profile.

### **We share personal data for legal and regulatory purposes**

We will also disclose your personal data if required to do so by law, in order to respond to a court order or request from law enforcement or other public authority and in order to meet national security or law enforcement requirements. We will disclose your personal data if this is necessary to comply with:

- a legal obligation
- protect or defend our rights, interests or property [or that of a third party]
- prevent or investigate possible wrong doing in connection with our services
- act in urgent circumstances to protect the personal safety of one or more individuals
- protect against legal liability.

**to give access to and for the duration that you specify in your profile. Your medical data is considered sensitive data and therefore further restrictions are applied to the storage and management of sensitive data as per GDPR requirements.**

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## About cookies



Cookies may be either “persistent” cookies or “session” cookies:

- a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date;
- a session cookie will expire at the end of the user session, when the web browser is closed

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## Why we use cookies

Cookies help us improve the products and services that we offer you. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use cookies to:

- identify you when you visit our website and as you navigate our website (authentication cookies)

**A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.**

**Cookies help us improve the products and services that we offer you.**



- help us to determine if you are logged into our website and to facilitate single sign on
- store information about your preferences and to personalize the website for you
- help us to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally
- help us to display advertisements that will be relevant to you
- help us to analyze the use and performance of our website and services; and
- store your preferences in relation to the use of cookies more generally.

## **Our service providers use cookies**

We may publish Google AdSense advertisements on our websites. To determine your interests, Google will track your behavior on our websites and on other websites across the web using cookies. This behavior tracking allows Google to tailor the advertisements that you see on other websites to reflect your interests. We do not publish interest-based advertisements on our websites.

You can view, delete or add interest categories associated with your browser by visiting: <https://adssettings.google.com>.

You can also opt out of the AdSense partner network cookie using those settings or using the Network Advertising Initiative's multi-cookie opt-out mechanism at: <http://optout.networkadvertising.org>.

To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>.





## Our Contact Details

Your privacy is important to us. If you have any comments or questions regarding this Privacy Statement, you can contact us at:

- by post, using our website contact form;
- by telephone, on the contact number published on our website
- by email, using the email address [connect@medrec.io](mailto:connect@medrec.io)