

Privacy Policy

Patients and Service Users

Updated: 14/07/2025



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1. Introduction and Purpose of This Privacy Notice

This privacy notice gives you information on how ID Medical Group, including ID Medical Clinical Services, collects, processes and protects your personal data. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide to be fully aware of how and why we are collecting and using your data.

We can only provide our services fully if the personal data we hold about you is accurate and up to date. Please keep us informed or update your details if your situation changes.

Our website is not intended for children, However, we may collect data relating to children as part of our authorised delivery of Clinical Services.

ID Medical Group Ltd. ID House, 2 Mill Square, Wolverton Mill South, Milton Keynes, MK12 5ZD – Company Number: 3829536 is the Data Controller and is responsible for your personal data (collectively referred to as 'ID Medical', 'we', 'us' or 'our' in this privacy notice).

ID Medical Group Holdings Ltd is wholly owned by AYA Healthcare UK Ltd (c/o McDermott Will & Emery UK LLP, 22 Bishopsgate, London, United Kingdom, EC2N 4BQ – company number: 15359712). Aya Healthcare UK Ltd is wholly owned by AYA Healthcare Inc whose registered office is at 5930 Cornerstone Court West, Suite 300, San Diego, CA 92121.

2. Why We Collect Your Personal Information

We keep detailed information and records about you to ensure:

- Clinical professionals involved in your care have access to accurate and up-to-date information about your medical history
- We are able to quickly and accurately assess your needs and provide excellent care
- Any concerns you may have or complaints you may raise can be properly investigated
- Continuity of care can be maintained should you:
 - Move to another area
 - Need the provision of different services
 - Seek the input of a different Healthcare Professional

3. What information we hold about you

We collect personal information about you when you are referred to our services. The information you provide is treated in accordance with current UK data protection legislation. The information collected includes:

- Identity Data, eg, name, date of birth, NHS number, NI number, gender, profession, driving licence (photo ID)
- Contact Data, eg, address, email address, phone number(s)
- Contact History, eg, previous appointments, contact log, correspondence, remote consultation video or voice recordings
- Medical history, eg, notes and reports on health, details of care and treatments, images, test results, medicines, side effects, allergies
- Miscellaneous – relevant information from people who provide care and know you well, eg, Healthcare Professionals and relatives

ID Medical Clinical Services Patients & Services Users

The information we gather about you to progress your clinical pathway and treatment is held on SystmOne a national and industry-standard platform designed for this purpose. All your data is securely stored in the EU with authorised access only. No patient information is processed nor held on ID Medical systems.

ID Medical DoLS (Deprivation of Liberty Safeguards) Patients and Service Users

The information we gather about you is provided by the relevant local authority and held on secure servers in the UK. Your information is processed to progress your clinical pathway and shared with the relevant local authority.

3.1 How Your Data Is Collected Through Cookies

If you use ID Medical's website, please note that it is hosted on WordPress and integrated with HubSpot (an AI-powered customer platform), which uses a number of tracking cookies to better understand a site visitor's behaviour. The types of cookies HubSpot sets include: analytics cookies, advertisement cookies, and cookies from third-party systems.

For more information regarding cookies used, [click here](#).

When you consent to your personal data being used on our website, Google may also use your personal data in accordance with their Privacy & Terms. For more information please see: policies.google.com

For ID Medical Clinical Services patients and service users, SystmOne uses its own cookies for similar purposes, and you can review its cookie policy via the SystmOne website.

For ID Medical DoLS patients and service users, each local authority uses its own cookies for similar purposes and you can review the cookie policy on the relevant website.

4. Consent and Communications

We care about the privacy of our users. We collect, use and share personally identifiable information and non-personally identifiable information. By providing your details and/or using the websites / systems noted in this Privacy Notice or consenting to record a remote consultation, for example, you agree to the collection of such information and to have your personal data and that of any person using your account collected, used, transferred and processed in accordance with this Privacy Policy. Any contact will be only for the purpose that the information was collected for.

You can withdraw or amend your consent for us to contact you at any time via the relevant website or by contacting us using the contact details below. However, please note that some consent is required to provide our clinical services.

As part of our overall strategy to improve services, we may incorporate 'Tracking Pixels' into our communications. This allows us to identify, for example, if an email has been opened.

In addition, all calls via our switchboard system are recorded for training and monitoring purposes.

5. How and When We Use Your Personal Data – Legal Basis

We will only use your personal data where we have a legal basis to do so, ie:

- Where we have obtained your consent to process your personal data
- Where ID Medical Clinical Services has a legitimate interest and your rights do not override these interests. This would typically be where we are investigating, assessing or conducting medical conditions and their treatment(s)
- Where we need to comply with legal or regulatory obligations. This would typically be to fulfil, eg, General Data Protection Regulation (GDPR) or Care Quality Commission (CQC) requirements in line with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (Part 3)
- Where we need to fulfil a contract we have entered into with you

We will use your personal data to:

- Ensure that treatments and advisory services are based on accurate and up-to-date information
- Correspond with other Healthcare Professionals, eg, your GP regarding your treatment unless advised otherwise
- Work effectively with other healthcare providers to ensure a joined-up approach
- Monitor the quality and outcomes of care provided to continually improve the service
- Investigate and address any concerns or complaints made about your healthcare
- Provide information required for financial transactions, eg, private insurance claims

6. Data Sharing

We may share your personal information with members of our group, which means subsidiaries, and any ultimate holding company and its subsidiaries, as defined in section 1159 of the United Kingdom Companies Act 2006.

6.1 Sharing Information With Selected Third Parties, including:

- NHS hospital trusts and Healthcare Professionals, eg, pharmacists, radiology and pathology staff, for the purpose of assessing, diagnosing and treating medical conditions
- Other private sector organisations, local authority departments, voluntary organisations involved in your care
- Other healthcare organisations, eg, if your treatment is to continue with another provider. If the other healthcare provider is outside of the EEA then best endeavours will be made regarding the most appropriate and secure transfer of your personal data as defined within the Data Protection Act 2018
- Analytic and search engine providers. This is aggregate, anonymous, non-identifiable information about our users that assist us in the improvement and optimisation of the website
- For the purposes of medical education and clinical treatment development. This is anonymous, non-identifiable information about our users to assist in the development of improving treatments

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- 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 these notices, terms and other agreements; or to protect the rights, property or safety of those with whom we do business, or others. This includes exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.
- in order to describe our services to prospective partners (advertisers, sponsors) and other reputable third parties and for other lawful purposes. These statistics will include no personally identifiable information and will comprise aggregate, anonymous statistics about visitors to the website (users and transactions).

6.2 Sharing Information With Nominated Individuals

We will normally share information regarding your treatment and the progress of your care with a nominated individual or individuals. This is normally your emergency contact, family member(s) or someone/people you feel close to.

By providing their details you are providing consent for us to keep them informed regarding your treatment and progress.

You can withdraw this consent at any time simply by letting us know using the contact details below.

6.3 Sharing Information When Legally Obligated To Do So

There are a few situations whereby we have a legal obligation to share personal information, eg, when a court order instructs us to do so, in the case of reporting an infectious disease, or to safeguard adults and/or children.

6.4 National Data Opt Out (NDOO)

In line with the recommendations of the National Data Guardian, you are entitled to opt out from having your personal data used for research or planning purposes. It applies to data that originates within the health and adult social care system in England.

To opt out you can complete an 'opt-out' form and send / take it to your GP surgery who will process your opt-out form and advise you when your opt-out is complete.

Alternatively, you can register an opt-out online at: www.nhs.uk/your-nhs-data-matters. You will need your NHS 10-digit number and an email address or phone number registered with an NHS service.

Or you can call 03003 035678

7. Third Party Links and International Transfers

If you use the ID Medical website, it may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check the policies of these websites before you submit any personal data.

Your personal data is stored securely on servers based in the UK and the EU. Your personal data will be processed by colleagues in the UK and may be processed by colleagues in Pune, India (ID Medical (India) LLP). ID Medical (India) LLP colleagues log into our UK-based servers and adhere to the same data protection protocols as our UK colleagues. ID Medical (India) LLP is governed by an International Data Transfer Agreement (IDTA) and a Data Processing Agreement and operates as a Data Processor within strict operational requirements.

8. Your Rights

You have a number of rights as outlined below. When exercising these rights, we will need to validate your identity to ensure the request is from you. This is a security measure to ensure personal data is not disclosed to an unauthorised third party. You may exercise your rights by contacting us via the contact details below.

8.1 Right To Be Informed

Your 'Right To Be Informed' encompasses the right to be provided with 'fair processing information' to ensure transparency over how your personal data is used. This is included in this Privacy Notice and our Terms and Conditions. The information provided should be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, and
- free of charge.

8.2 Right To Restrict Processing

You have the right to ask us not to process your personal data for, eg, marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at marketing@id-medical.com

8.3 Right of Access

You have the right to access the information we hold about you. An access request is free of charge unless considered repetitive or excessive, in which case, a small admin charge may be required. A request for access can be made via the contact details below.

8.4 Right of Rectification

You are entitled to have your personal data corrected if it is inaccurate or completed if it is incomplete. If the personal data in question has been disclosed to third parties, we will inform them of the rectification where possible and confirm with you which third parties the data has been disclosed to.

8.5 Right To Erasure

You have the right to request the deletion of personal data where there is no compelling reason for its continued processing. There are some circumstances where this right may not be met and a request refused, eg, to comply with a legal obligation such as HMRC or framework retention requirements (see Data Retention below for more details).

8.6 Right To Data Portability

The right to data portability allows you to obtain and reuse your personal data. It allows you to move, copy or transfer personal data easily in a safe and secure way, without hindrance to usability.

The right to data portability applies to personal data:

- provided by you;
- where you have provided consent for processing or the processing is for the performance of a contract; and
- when processing is carried out by automated means.

8.7 Right To Object

You have the right to object to processing based on the performance of a task in the public interest or processing based on a legitimate interest, eg, direct marketing. An objection must be based on your particular circumstances and processing must cease unless there are compelling reasons otherwise, eg, defence of a legal claim.

8.8 Rights Relating to Automated Decision Making and Profiling

Data protection legislation provides safeguards for individuals against the risk that a potentially damaging decision is taken solely based on automated processing, ie, without human intervention.

ID Medical employs no fully automated processes that result in particular individuals being impacted.

9. Data Security

Where ID Medical systems and processes are used, we have in place appropriate security measures to prevent your data being accidentally lost, used, accessed in an unauthorised way, altered or disclosed. Access to your personal data is strictly limited to specific authorised individuals who require access to perform their roles.

All data collected and processed by ID Medical is stored on servers in the UK and the EU.

Internal policies and procedures are in place and reviewed regularly to identify and notify of any breaches of these procedures.

10. Data Retention

ID Medical Clinical Services Patients and Service Users

We will only retain your data for as long as necessary to fulfil the purposes it was collected for and satisfy any legal, accounting or reporting requirements. For example, we need to retain your details for seven years to satisfy HMRC requirements following any financial transactions.

Prior to commencing any treatment or clinical procedures with us, by registering your details with us, we will, typically, retain your details for a period of three years unless you request that they be deleted. In this instance, we will anonymise your data so that it cannot be associated with you and retained securely for statistical research purposes.

If you are referred to us via your GP, for example, then details within your patient record will be available on a secure basis and by authorised staff only.

ID Medical DoLS (Deprivation of Liberty Safeguarding) Patients and Service Users

We will only retain your data from the time of receipt from a local authority to three months following the completed assessment being returned to that local authority. ID Medical retains no patient nor service user information beyond this period as it's held by the local authority.

11. Contact Us

Our Data Protection Officer is responsible for overseeing questions relating to this privacy notice. If you have questions about this privacy notice including requests to exercise your legal rights, please contact the DPO using the contact details below.

Contact via the website or by email is encrypted and none of the data you supply will be stored by the website or passed to or processed by a third-party processor.

To contact us, please visit our website: www.id-medical.com or e-mail as follows:

General enquiries: clinicalservices@id-medical.com

Data Protection Officer: dpo@id-medical.com

Or telephone: (0)1908 552 820

12. Complaints

Should you have cause to make a complaint or express dissatisfaction with ID Medical, a member of its staff or processes, please email or telephone our Complaint Resolutions Team at:

resolutions@id-medical.com / 01908 552820. A member of our Resolutions Team will address your concerns as appropriate.

Should you feel that your concern has not been resolved satisfactorily, you also have the right to direct your complaint to the supervisory authority – contact details below.

13. Supervisory Authority and Data Breaches

The relevant supervisory authority for data protection legislation in the UK is the Information Commissioner's Office (ICO). Their contact details are:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

Tel: 0303 123 1113 (local rate)

Website: <https://ico.org.uk>

ID Medical has designed the protection and security of data protection into its systems, processes and staff knowledge. In the event that a breach of data protection is identified, the circumstances are logged and appropriate actions taken including informing the individuals concerned and the supervisory authority. Each case is considered separately and depends on the risk to the rights and freedoms of the individual(s) impacted.