

Privacy Policy

WESTMINSTER WOMEN'S CLINIC LIMITED (WWC) is committed to protecting and respecting your privacy.

WWC understands that your personal data is entrusted to us and appreciates the importance of protecting and respecting your privacy. To this end we comply fully with the data protection laws in force in the UK (**Data Protection Laws**) and with all applicable clinical confidentiality guidelines including those published from time to time by the General Medical Council and the Nursing and Midwifery Council.

This Privacy Policy sets out the basis on which we collect and process personal data about you including our practices regarding the collection, use, storage and disclosure of personal data that we collect from you and/or hold about you, and your rights in relation to that data. Please read the following carefully to understand how we process your personal data. By providing your personal data to us or by using our services or website you are accepting or consenting to the practices as described or referred to in this Privacy Policy.

For the purpose of Data Protection Laws, the data controller is WWC, with registered address at Venture X, Fifth Floor, Building 7, 566 Chiswick High Road, London, W4 5YG, UK and a Company Registered in England Number: 10819082. When we refer to 'we', 'us' and 'our', we mean WWC.

When we refer to **personal data** in this policy, we mean information that can or has the potential to identify you as an individual. Accordingly, we may hold and use personal data about you as a customer, a patient or in any other capacity, for example, if you work for us, when you visit one of our websites, complete a form, access our services or speak to us. Depending on what services you receive from us this may include **sensitive personal data** such as information relating to your health.

1. The Types of personal data we collect

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, marital status, title, date of birth and gender as well as your nationality and entitlement to treatment in the UK.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers. The name and contact details (including phone number) of your next of kin.

Where you have named someone as your next of kin and provided us with personal data about that individual, it is your responsibility to ensure that that individual is aware of and accepts the terms of this Privacy Policy.

- **Transaction Data** includes details about our contract with you, payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, 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.
- **Usage Data** includes information about how you interact with and use our website, services.
- **Special Category Data:** The data that we request from you may include sensitive personal data. This includes your medical records whether provided by third parties or collected by WWC and information that relates to mental or physical health or racial or ethnic origin. By providing us with sensitive personal data, you give us your explicit consent to process this sensitive personal data for the purposes set out in this Privacy Policy.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and any patient feedback and treatment outcome information that you may provide.
- **Employment records:** if you are employed by WWC we will also hold and process other information relating to your recruitment, your employment and financial data for paying your salary.

2. How we collect personal data from you:

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 registering to be a patient with us or to be a member of staff at WWC by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **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 data by using cookies and other similar technologies. See details about our cookies below.
- **Third party or publicly available sources.** We will receive personal data about you from various third parties as set out below.

- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services Stripe Payments and GoCardless.

3. 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 have entered into with you to provide you with employment or healthcare services and decide how best to provide treatment to you as well as to keep your records up to date. This will include checking the accuracy of information about you and the quality of your treatment or care, including auditing medical and billing information for insurance claims as well as part of any claims or litigation process.
- **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 we need to share your sensitive personal data with another healthcare organisation or your GP.
- **Sensitive personal data:** Sensitive personal data related to your health will only be disclosed to those involved with your treatment or care, or in accordance with UK laws and guidelines of professional bodies or for the purpose of clinical audits (unless you object). We will only use your sensitive personal data for the purposes for which you have given us your explicit consent to use it.

4. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below.

- Internal third parties such as our staff and fellow medical professionals working at

WWC.

- External Third Parties including:
 - **Hospitals / Clinics working with us:** we share clinical information about you with hospitals / clinics as we think necessary for your treatment.
 - **External practitioners:** If we refer you externally for treatment, we will share with the person or organisation that we refer you to, the clinical and administrative information we consider necessary for that referral. It will always be clear when we do this.
 - **Your GP:** If when treating you we believe it to be clinically advisable, we may also share information about your treatment with your GP. You can ask us not to do this, in which case we will respect that request if we are legally permitted to do so, but you should be aware that it can be potentially very dangerous and/or detrimental to your health to deny your GP full information about your medical history, and we strongly advise against it.
 - **Your insurer:** We share with your medical insurer information about your treatment, its clinical necessity and its cost, only if they are paying for all or part of your treatment with us. We provide only the information to which they are entitled. If you raise a complaint or a claim we may be required to share personal data with your medical insurer for the purposes of investigating any complaint/claim.
 - **The NHS:** If you are referred to us for treatment by the NHS, we will share the details of your treatment with the part of the NHS that referred you to us, as necessary to perform, process and report back on that treatment.
 - **Medical regulators:** We may be requested – and in some cases can be required – to share certain information (including personal data and sensitive personal data) about you and your care with medical regulators such as the General Medical Council or the Nursing and Midwifery Council, for example if you make a complaint, or the conduct of a medical professional involved in your treatment is alleged to have fallen below the appropriate standards and the regulator wishes to investigate. We will ensure that we do so within the framework of the law and with due respect for your privacy.
 - 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.
 - Government bodies including HMRC, the Home Office, police and other such departments where we are required to share data with them by law.

- Anyone that you ask us to communicate with or provide as an emergency contact, for example your next of kin or carer.
- Credit referencing agencies.
- Our third-party service providers such as debt collecting agencies and credit referencing agencies and our IT suppliers, lawyers, document management providers and tax advisers.

In all such instances, we remain the data controller of your personal data and 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.

5. Third-party marketing

We do not share your personal data with any third party for their own marketing purposes.

1. International transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that we use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers.

2. 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, 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 all subject to a duty of confidentiality.

Sensitive personal data will carry an extra layer of security and access clearance.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website or documents we send you, you are responsible

for keeping that password confidential. We ask you not to share a password with anyone.

The transmission of information via the internet cannot be guaranteed as completely secure. However, we ensure that any information transferred to our servers is via an encrypted connection. At your request, we may occasionally transfer personal information to you via email, or you may choose to transfer information to us via email. Email is not a secure method of information transmission; if you choose to send or receive such information via email, you do so at your own risk.

3. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, and Transaction Data) for six years after they cease being patients for tax purposes. We are also required to retain your health records for eight years.

In some circumstances you can ask us to delete your data: see below for further information.

4. 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. 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 as the legal basis for that particular use of your data. 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 marketing purposes.
- **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.
- **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 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.

5. 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: hello@westminsterwomens.co.uk
- Telephone number: 02035852600

6. 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.

7. 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 3 April 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.

8. 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.

6. Cookies

Our websites use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our websites.

By law, website operators are required to ask for a website user's permission when placing certain kinds of cookie on their devices for the first time. Where consent is required, the law states that it should be "informed consent", which means we must ensure that you understand what cookies are and why we want to use them. We are committed to providing the best digital service to you whilst at the same time fully protecting your privacy. For further information on our cookies policy and how we use cookies through use of all our online services, please see below.

What are Cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie.

Cookies are useful because they allow a website to recognise a user's device. Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving your user experience.

They can also help to ensure that adverts you see online are more relevant to you and

your interests.

Category 1 Cookies

These cookies are essential in order to enable you to move around our websites and use its features, such as accessing secure areas of the websites. Without these cookies, services you have asked for cannot be provided.

Your consent is not required for the delivery of those cookies which are strictly necessary to provide services requested by you.

We use these types of cookies.

Category 2 Cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All the information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Web analytics that use cookies to gather data to enhance the performance of a website fall into this category. For example, they may be used for testing designs and ensuring a consistent look and feel is maintained for the user. This category does not include cookies used for behavioural/ targeted advertising networks.

We use these types of cookies. By using our website and online services you agree that we can place these types of cookies on your device.

Category 3 Cookies

These cookies allow our websites to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video. The information these cookies collect is generally anonymised and they cannot track your browsing activity on other websites.

We use these types of cookies. By using our websites these you agree that we can place these types of cookies on your device.

Category 4 Cookies

These cookies are used to deliver adverts more relevant to you and your interests They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by

advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

We do not use these cookies on our website.

Definitions used above are consistent with those supplied by the International Chamber of Commerce 'ICC UK Cookie Guide' April 2012.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential Category 1 Cookies) you may not be able to access all or parts of our websites. For information on how to delete cookies, please refer to: <https://ico.org.uk/for-the-public/online/cookies>

Important note concerning data processing in connection with Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google Ireland Limited. If the responsible body for the data processing that occurs via this website has their basis outside of the European Economic area and Switzerland, then the associated Google Analytics data processing is carried out by Google LLC. Google Ireland Limited and Google LLC. will hereinafter be referred to as "Google".

Google Analytics uses "cookies", which are text files saved on the site visitor's computer, to help the website analyse their use of the site. The information generated by the cookie (including the truncated IP address) about the use of the website will normally be transmitted to and stored by Google.

Google Analytics is used exclusively with the extension "_anonymizeIp ()" on this website. This extension ensures an anonymization of the IP address by truncation and excludes a direct personal reference. Via this extension Google truncates the site visitor's IP address within member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional situations will the site visitor's full IP address be transmitted to Google servers in the United States and truncated there. The IP address, that is provided by the site visitor's browser in using Google Analytics will not be merged by Google with other data from Google.

On behalf of the site operator, Google will use the information collected to evaluate the use of the website, to compile reports on website activity and to provide other website and internet related services to the site operator (Art. 6 (1)(f) GDPR). The legitimate

interest in data processing lies in the optimization of this website, the analysis of the use of the website and the adaptation of the content. The interests of the users are adequately protected by the pseudonymization of their data.

Google LLC. has certified their compliance with the EU-U.S. Privacy Shield Framework and on that basis they provides a guarantee to comply with European data protection law. The data sent and linked to the Google Analytics cookies, e.g. user IDs or advertising IDs will be automatically deleted after 50 months. The deletion of data whose retention period has been reached is done automatically once a month.

The website visitor may refuse the use of cookies by selecting the appropriate settings in their browser. The website visitor can also prevent Google from collecting information (including their IP address) via cookies and processing this information by downloading this browser plugin and installing it: <http://tools.google.com/dlpage/gaoptout>

The website visitor can prevent data collection via Google Analytics on this website by clicking here. An "Opt-out Cookie" shall then be applied which shall prevent any future collection of the site visitors data when visiting this website.

Further information concerning data processing and use by Google, the settings and deactivation possibilities can be found in the Google Privacy Policy (<https://policies.google.com/privacy>) as well as in the Google Ads Settings (<https://adssettings.google.com/authenticated>).

reCAPTCHA

We use the reCAPTCHA service provided by Google LLC (Google) to protect your submissions via internet submission forms on this site. This plugin checks if you are a person in order to prevent certain website functions from being (ab)used by spam bots (particularly comments). This plugin query includes the sending of the IP address and possibly other data required by Google for the Google reCAPTCHA service. For this purpose your input will be communicated to and used by Google. However, your IP address is previously truncated by Google within member states of the European Union or in other states which are party to the agreement on the European Economic Area and is, as such, anonymized. Only in exceptional cases is a full IP address transmitted to a Google server in the United States and truncated there. On behalf of the operator of this website, Google will use this information to evaluate your use of this service. The IP address provided by reCaptcha from your browser shall not be merged with any other data from Google.

This data collection is subject to the data protection regulations of Google (Google Inc.).

For more information about Google's privacy policy, please visit: <https://policies.google.com/privacy?hl=en>

By using the reCAPTCHA service, you consent to the processing of data about you by Google in the manner and for the purposes set out above. It is our policy not to use your data for marketing purposes

Accessing and updating your information

The law gives you certain rights in respect of the personal data that we hold about you. Below is a short overview of the most commonly used rights. It is not an exhaustive statement of the law.

- With some exceptions designed to protect the rights of others, and subject to payment of a small administrative fee (currently £10, or up to £50 for paper-based health records), you have the right to a copy of the personal data that we hold about you.
- You have the right to have the personal data we hold about you corrected if it is factually inaccurate. It is important to understand that this right does not extend to matters of opinion, such as medical diagnoses. If any of your personal data has changed, especially contact information such as: email address, postal address and phone number please get in touch with us at hello@westminsterwomens.co.uk so we can ensure your personal data is kept up to date.
- If you want to exercise your rights in respect of your personal data, the best way to do so is to contact us by email [enter e-mail address] In order to protect your privacy, we may ask you to prove your identity before we take any steps in response to such a request.

If you are not satisfied with how we handle your request, you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website (<https://ico.org.uk/>)

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