

Anima Health

Privacy Policy

This privacy policy gives you information about how Anima Health collects and uses the personal data you provide when you use this website.

As part of the services that we provide to NHS England and healthcare providers such as GP surgeries (**Healthcare Providers**), we act as a data processor on behalf of those Healthcare Providers. This means that the Healthcare Providers decide how that data is processed, we follow their instructions and that processing falls outside the scope of this privacy policy. For more information about how Healthcare Providers collect and use your personal data, please contact the relevant Healthcare Provider directly.

This website is not intended for children and we do not knowingly collect data relating to children under the age of 13.

Controller

Continuum Health Limited, trading as Anima Health is the data controller and is responsible for the personal data that we collect from you directly (referred to as "**Anima Health**", "**we**", "**us**" or "**our**" in this privacy policy).

1. The types of personal data we collect about you

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

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, username or similar identifier, title and date of birth.
- **Contact Data** includes address and email address.
- **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.
- **Usage Data** includes information about how you interact with and use our website and services.

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 services that we provide to help improve the website and our service offering.

2. 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 creating an account on our website, filling in online forms or by corresponding with us directly.
- **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 and other similar technologies.

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 a contract.
- **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.

Purposes for which we will use your personal data

We have set out below a description of all the ways we will process 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.

Purpose/Use: To register you as a new customer

Type of data: (a) Identity, (b) Contact

Legal basis: Performance of a contract

Purpose/Use: To link your profile to your organisation (if you are accessing our services on behalf of a Healthcare Provider) or NHS Digital (if you are accessing our services as a patient)

Type of data: (a) Identity, (b) Contact

Legal basis: Performance of a contract

Purpose/Use: To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy, (b) Dealing with your requests, complaints and queries

Type of data: (a) Identity, (b) Contact

Legal basis: (a) Performance of a contract, (b) Necessary to comply with a legal obligation, (c)

Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)

Purpose/Use: To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

Type of data: (a) Identity, (b) Contact, (c) Technical, (d) Usage

Legal basis: 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)

Purpose/Use: To use data analytics to improve our services

Type of data: (a) Technical, (b) Usage

Legal basis: 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)

4. Disclosures of your personal data

We may share your personal data where necessary with third party service providers that help us to operate our business. We do not share patient data with these third party service providers. 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. International transfers

We do not transfer your personal data outside the UK but, if we need to do so in the future, we will ensure that a similar degree of protection is afforded to it by ensuring that the appropriate legal safeguards are implemented.

6. 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.

7. 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.

8. 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.
- 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 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 us at support@animahealth.com.

9. NHS login

Please note that if you access our service using your NHS login details, the identity verification services are managed by NHS England. NHS England is the controller for any personal information you provided to NHS England to get an NHS login account and verify your identity, and uses that personal information solely for that single purpose. For this personal information, our role is a “processor” only and we must act under the instructions provided by NHS England (as the “controller”) when verifying your identity. To see NHS login’s Privacy Notice and Terms and Conditions, please [click here](#). This restriction does not apply to the personal information you provide to us separately.

10. 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 at support@animahealth.com.

11. 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.

12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. 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.