

Privacy Policy

Please take a moment to read our Privacy Policy. This should be read in conjunction with our Terms & Conditions. Please note that words which are defined in our Terms & Conditions also apply to this Privacy Policy. If there is anything you do not understand then please Contact Us.

1. This Privacy Policy

Isabel Healthcare Limited ("Isabel", "we" or "us") is incorporated in England and Wales with company number 04759944 is the Data Controller under the Data Protection Act 2018 and the European Union General Data Protection Regulation ("the DP Laws"). Isabel is committed to protecting your privacy. This Privacy Policy sets out how we treat your personal information, allowing you to make informed choices about the personal information which (a) Isabel collects from you when you access and/or use the Website, or (b) you provide to Isabel in any other way. In addition, this Privacy Policy complies with the DP Laws.

You can contact us using the Contact Us feature of the <https://symptomchecker.isabelhealthcare.com> ("the Website").

By registering or supplying data or information on the Website, you consent to the collection, use, and transfer of your information under the terms of this Privacy Policy.

Isabel Healthcare Limited is based in the United Kingdom, and your personal information is collected, stored, used and shared in accordance with UK and European Union laws. Please be aware that the information you provide to Isabel through the Website or otherwise will be transferred to the United States, as described in section 5.

You should be aware that privacy laws in the United States may not be equivalent to the UK and European Union laws, and by using the Website, you hereby consent to the transfer, storage and processing of your personal information in the United States in accordance with this Privacy Policy and applicable law.

If you do not consent to the terms of this Privacy Policy, or the transfer, storage and processing of your personal information in the United States, please do not use this Website.

2. What Isabel means by Personal Data

Personal Data means any data about you which includes data which identifies you, or from which you can be identified by cross referencing with other commonly available sources of information.

If we receive information about you in which you are not identified, and from which you cannot easily be identified, for example, if you use the Symptom Checker without registering, this is not Personal Data.

The data which we may collect from you is set out below. All personal data that Isabel obtains from you will be dealt with in accordance with the provisions of this Privacy Policy and the DP Laws.

3. The Personal Data which Isabel collects and/or you provide to Isabel includes the following:

- Navigation data – IP address from which you are accessing the Website
- any website from which you linked to the Website.
- If you register with Isabel, we will collect various details about you, including (without limitation) your name, email address and information as to how you heard about the Website.
- When you provide symptoms or any other information to us, all that information including any details of medical symptoms, history and conditions and any other data you provide, including any information on racial or ethnic origin and sexual orientation.
- Your views on the effectiveness and ease of use of the Website
- Finally, Isabel uses session cookies to store information about your current Website session. These cookies are deleted when you leave the Website and close your browser. If you so choose, Isabel will also use a cookie to collect and store your Username and Password. Isabel may also use cookies to collect statistical information about your use of the Website. Please see below for more information About Cookies.

The above information will be collected by the Website.

Isabel may also collect Personal Data when you contact Isabel.

If you provide personal information to us about other people you must provide them with a copy of this Privacy Policy and obtain any consent where it is required for the processing of that person's information.

4. How Isabel uses your personal information

Your personal information is used by Isabel: -

- to provide possible diagnoses which are suggested by the symptoms which you report to us;
- so that Isabel can administer and support the Website and to provide you with access to the appropriate areas and functions of the Website.
- to contact you from time to time, in order to ask for your views on the Website and to notify you occasionally about important changes or developments to the Website.
- where it includes your views about the Website and improvements you would like to see made, or statistical information collected, so that Isabel can improve its service to you and others or make visits to the Website more useful and rewarding.



- To limit use of the Symptom Checker and the availability of the free trials of other functionality of Isabel's websites.

Any processing of information will be undertaken for the legitimate interests pursued by Isabel in accordance with GDPR Article 6 paragraph 1(f), which are running websites which provide on a viable and profit making basis, assistance to health professionals and to others in making diagnoses of symptoms, to accumulate data which enables analysis and reporting of circumstances and medical outcomes assistance and ancillary purposes.

5. How Isabel discloses to, or shares with, third parties, your personal information

Except as described in this Privacy Policy or as specifically agreed by you, we will not disclose any of your Personal Data. We may only release Personal Data:

- to comply with legal requirements such a law, regulation, search warrant, subpoena or court order;
- in special cases, such as in response to a physical threat to you or others, to protect property or defend or assert legal rights;
- for internal reorganisation purposes; and/or
- if Isabel enters into joint-venture or Isabel or its assets and activities are sold to or merged with another business entity.

If we are legally compelled to disclose your Personal Data to a third party, we will attempt to notify you unless doing so would violate the law or court order.

In addition, we may disclose your personal information as described below:-

- (a) to the provider of the servers on which our website is hosted and/or which we engage to store our data; This supplier is currently located in the United States;
- (b) to companies which we engage to assist us in communicating with you. This supplier is currently in the United States.
- (c) to other companies in the same group of companies as Isabel. This includes Isabel Healthcare Inc, which is incorporated in the State of Delaware and operates in the United States.

proportionate disclosure to third party contractors in respect of the hosting, support, maintenance and operations of the Website,

6. How Isabel protects your personal information

Isabel is strongly committed to data security and we take reasonable and appropriate steps to protect the security of your personal information from unauthorized access, loss, misuse, alteration or corruption. Isabel has put in place reasonable and appropriate physical, electronic, and managerial procedures to safeguard and secure the security of the information you provide to

Isabel. These steps include (without limitation) communicating this Privacy Policy to Isabel employees and relevant contractors. Only authorised employees and contractors under strict controls will have access to your personal information. HOWEVER, WHILE ISABEL STRIVES TO PROTECT YOUR PERSONAL INFORMATION, DUE TO THE NATURE OF THE INTERNET ISABEL CANNOT GUARANTEE THE SECURITY OF ANY INFORMATION YOU TRANSMIT TO ISABEL. WITH THIS IN MIND, YOU MUST TAKE EVERY PRECAUTION TO PROTECT YOUR PERSONAL INFORMATION WHILE YOU ARE ON THE INTERNET.

7. **How long Isabel keeps your Personal Data**

Subject to any request that your data be deleted per section 9 below, Isabel will keep and use the Personal Data for (a) as long as you are registered user of Isabel and for up to 7 years afterwards, in order to deal with any consequent queries or complaints you may have, or (b) for as long as the law permits (whichever is shorter); or

After the relevant retention period has expired, your personal information will (to the extent possible) be expunged from our systems, unless there is a specific legal reason or requirement to keep the information for longer, for example if it is relevant to any current or potential legal proceedings.

Notwithstanding the above, Isabel may keep statistical or anonymised information (from which you cannot be identified) for longer periods.

The information about unregistered users is not Personal Data as it does not identify nor permit the easy identification of individuals.

8. **Your rights include:**

- The right to access your personal information
- The right to rectification of any erroneous information
- The right to erasure of your information subject to certain exceptions
- The right to restriction of processing
- The right to data portability
- The right to object to marketing
- Rights relating to automated decision-making
- The right to withdraw consent
- The right to lodge a complaint with the ICO (**Information Commissioner's Office**)

You may exercise these rights at any time by contacting us with details of your request, using the details in the "Contact" section of our website.

You have a right to complain to the Information Commissioner's Office if you believe that any use of your personal information by us is in breach of applicable data protection laws and/ or

regulations. More information can be found on the Information Commissioner's Office website: <https://ico.org.uk/>. This will not affect any other legal rights or remedies that you have.

9. **Contacting Isabel**

We regularly review our compliance with this Privacy Policy. If you have a complaint or problem, please contact us by email at info@isabelhealthcare.com. Our customer service department will forward your complaint to the appropriate internal department for a response or resolution. We try to answer every email within 2 days but may not always be able to do so.

If you want to delete or update your Personal Identifiable Information, please Contact Us.

10. **Automated processing**

We will not carry out any automated processing of your personal data.

11. **About cookies**

Cookies are small files stored in your computer's hard drive by your web browser. When you access the Website our computer server will access these cookies so that it can recognise your computer and make using the Website easier for you. For example, cookies allow the Website to remember your Username and Password to save you having to retype it every time you visit the Website. Most web browsers automatically accept cookies, but you can alter your settings to allow you to be prompted every time a cookie is sent to you or you can choose not to receive cookies at all. However, please note that if you have 'disabled' cookies in your browser this way you may not be able to use certain features on the Website.

12. **CHANGES TO THIS PRIVACY POLICY**

Isabel will inform you if a material change is made to this Privacy Policy, which means a change which expands or materially changes the permissible use or disclosures of your Personal Data. Your continued use of the Website will indicate acceptance of the changes. You may of course choose to cease using the Website. Please exit the Website immediately if you do not agree to the terms of this Privacy Policy or any revised policy.

Non-Material Changes – Isabel may make non-material changes to the Privacy Policy that do not affect the use or protection of any of your Personal Data, and, when it does so, we may not notify you of such non-material changes.

If we decide to change this Privacy Policy, the new policy will be available on the links from the Website.

Isabel reserves the right to modify this Privacy Policy at any time, so please review it frequently.