



my local surgery[®]

Welcome to My Local Surgery

We are My Local Surgery Ltd (My Local Surgery, we, our or us) and we operate the website www.mylocalsurgery.co.uk (Site) which is an online platform whereby we connect you with third parties who will provide you with healthcare specialist advice, access to next-day medication and to treat conditions that can be dealt with quickly and ultimately save you time whilst freeing up resources and supporting the National Health Service (NHS), and do so as a data controller.

Our address of business is: Old Poultry Shed, Upper Slackstead Farm, Farley Lane, Braishfield, Romsey, Hampshire, SO51 0QL, United Kingdom and our contact details are set out in section 16 “How You & Us Communicate” of this Policy.

This privacy policy (Policy) outlines the types of data we collect when you use our Site, the purposes they serve and how your personal data is protected.

This Policy, along with the following additional policies, are the rules governing your rights and obligations on the Site:

[Terms of Use;](#)

[Cookies Policy](#);

[Customer Terms and Conditions](#) (for Site registered customers only); and

Pharmacist and Healthcare Professional Terms and Conditions (for Site registered pharmacists and healthcare professionals only),

(together, the Policies).

Information We Collect & Receive & How We Use It

We process personal data about the following persons:

pharmacists and healthcare professionals who use our Site and/or our services;

customers who use our Site and/or our services;

visitors to Site; and

business partners, including customers and suppliers, whose contact information we process to manage our business relationships.

We also collect personal data when you fill in forms on our Site – including the account registration form for pharmacists and healthcare professionals. If you are a customer, we will obtain some personal data about you in the prescription submitted by your pharmacist or healthcare professional.

Our Site automatically collects information about all visitors – see our Cookies Policy for further information,

Unless otherwise indicated, all categories of information on our account registration and order and payment forms are mandatory in order to, respectively, create a prescribing account or complete a customer prescription order. Should you fail to provide us with the information required, we will be unable to provide our services.

By engaging with Us and using the Site, you consent to us collecting, receiving, storing and transferring the following information:

Information Collected	Purpose / Activity	Lawful Basis
Personal Identification Information	We will obtain and use this information to enable you to register on the Site and for us to perform our contract with you and allow you to use the Site and the services on it. We may also use this information to contact you about the services on our Site.	Necessary for our contractual performance with you and for legal compliance and we have a legitimate interest in enabling account creation so you can access the services on our Site.
Personal Identification information –	We will obtain and use this information to verify a pharmacist’s and healthcare professional’s identity during account creation.	Necessary for our contractual performance with you.
Personal Identification information	To respond to user queries or complaints.	Compliance with a legal obligation. Legitimate interest in providing customer service.
Transaction Data -	This information is collected, processed and transferred to the relevant payment service provider (PayPal or Stripe) to enable you use the Site and make and receive payment for the services. We use such information to facilitate the purchase and sale of the services on the Site.	The processing is necessary to our performance of a contract with you.
Demographic Information	We will obtain and use this information to enhance user experience and tailor services to	Necessary for our contractual performance with you.

Information Collected	Purpose / Activity	Lawful Basis
Service Details –	<p>specific geographic preferences with your consent.</p> <p>These details are collected in order to show what services we have available on our Site.</p>	Necessary for our contractual performance with you.
Technical Data –	<p>We use this information to help us understand how people visit our Site and access the services on our Site and ensure that we can continue to maintain and improve the Site to service your needs.</p>	Cookies and similar technologies, which are only used where you have your consent.
Personal Identification information	To conduct service analytics.	Legitimate interest in understanding how our services are used in order to make improvements to them.
Usage Data –	This information is used to allow us to analyse user engagement patterns and improve the overall user experience, with your consent.	Cookies and similar technologies, which are only used where you have provided your consent. Legitimate interest in providing a functioning and secure website (in relation to essential/strictly necessary cookies).
Marketing and Communications Preferences –	We use this information to help the services provided on our Site run effectively and to provide you with communications and updates in relation to your use of our Site.	Necessary for our contractual performance with you. We have a legitimate interest to ensure you are informed of public health services relevant to you and your use of the services on our Site.
Third-Party Data –	This information is used strictly for disclosed purposes and to enable our Site to function properly so that you can access and use the services on our Site.	Necessary for our contractual performance with you. We have a legitimate interest to ensure you are informed of public health services relevant to you and your use of the services on our Site.
Aggregated Data –	This information is not considered personal data as it does not reveal individual identities and is used for analytical purposes, Site improvement and industry insights.	We have a legitimate interest in ensuring our Site is maintained and improved accordingly.

How We Collect Your Information

We use various methods to collect data from and about you which includes through:

your interactions with us: we collect the information you enter to setup and manage your account and when using our services. This information is kept to provide you with our service and as outlined above.

We also collect a very limited amount of information when you interact with the chat bot on our Site, which is provided by Crisp, a third-party provider. The information stored is your email address, visitor number, approximate location (based on your internet provider) and the transcript of the interaction. This information is only available during your interaction and may be used at the time, if you request support from our Customer Support team. Once the chat is terminated, the information is erased.

automated technologies or interactions: through your interaction with our Site, we will automatically collect Technical Data and Usage Data about your browsing actions and patterns. We collect this personal data by using cookies and other similar technologies, further information of which is available in our Cookie Policy.

We take reasonable steps to ensure that the personal data we hold about you is accurate and up to date. However, you have overall responsibility to provide us with correct data and keeping this up to date on the Site. We have no responsibility and do not accept any liability for incorrect data entered by you in the case of your information being sent to the locations you have specified.

How We Use Your Information & Our Legal Basis

Our information practices are embedded in transparency and legal compliance. Information is utilised to facilitate secure services, enhance user experience, and meet legal obligations. We prioritise your privacy, ensuring data use aligns with the Site's commitment to transparency and legal standards, particularly concerning your personal information. To the extent required by applicable law, we rely on a number of legal bases to use your information in the ways set out in this Policy. These are identified in the table in section 2 "Information We Collect & How We Receive & Use It" of this Policy and are further outlined below for transparency.

Necessary for contractual performance with you

We use certain information that is necessary for you to access and use the services on our Site and perform our Terms of Use and any other relevant contracts with you. We will be required to close your account if we cannot process your personal information for such purposes.

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 most secure experience on our Site. We will ensure to consider and balance any potential impact on you and your rights before we process your 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 required to do so by law.

Improvement of Services

Your data is utilised to deliver, personalise, and continuously improve our services. This includes tailoring content, features, and functionalities to enhance your overall experience on our Site.

Support and Communication

We process information to provide customer support, address queries, and facilitate communication with our users. This ensures a seamless and responsive interaction between you and our Site.

Regulatory & Environmental Bodies

We may, in cases where it is relevant, share data with regulatory authorities and environmental organisations to comply with legal obligations and contribute to environmental initiatives, fostering accountability and transparency.

Marketing & Promotions

We employ data for targeted advertising, promotions, and marketing activities. This allows us to share relevant content, information about services on our Site that may be of interest to you and any updates, enhancing user engagement while respecting your preferences and choices.

Decision-making and Profiling

We may use some of your personal data for decision making or profiling purposes to help us understand our customers and identify and market to customers with similar characteristics and determine your interest in other services on our Site (and if they will be of interest to you). We are legally allowed to use information about the services and products you use for profiling purposes to help improve our marketing.

Security

Data is utilised to maintain the security of our Site. This includes monitoring, detecting, and preventing security threats, ensuring the confidentiality and integrity of user information.

Legal Compliance and Basis

We process data to fulfil legal requirements, ensuring compliance with applicable laws and regulations. The Site and the services on it are subject to laws and regulations that require us to collect, use and store your personal information in certain ways. This may involve responding to legal requests, investigations, or exercising legal rights and remedies. In addition we may process personal data pursuant to rights set out in UK General Data Protection Regulation under Article 6(1)(e) where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller and under Article 9(2)(h) for the purposes of preventative or occupational medicine, medical diagnosis, the provision of health treatment or the management of health systems and services pursuant to a contract with a healthcare professional.

Our usage of data is grounded in various legal bases, including user consent, contractual necessity, legal obligations, and legitimate interests. Where we need to process personal data to comply with the law or under the terms of our contract with you and you fail to provide that data when requested, you may not be able to use the services on our Site.

How We Share Your Information

We may share your data with third parties where necessary to allow you to access and use the services on our Site, comply with our legal obligations or for the purposes set out in this Policy, including:

Information Sharing Practices

Our commitment to transparency guides our information sharing practices. Users agree to disclose personal data details for the purposes of using the services available on our Site, which will be shared with pharmacists or healthcare professionals who are verified and registered on our Site in accordance with our Pharmacist and Healthcare Professional Terms and Conditions, all such pharmacists are registered with the General Pharmaceutical Council (or the Pharmaceutical Society of Ireland for users in the Republic of Ireland). This information is shared to enable them to assess your health conditions, advise you appropriately and deliver the services that you request in accordance with the Policies.

Service Providers and Partners

We may share your information with trusted service providers (such as registered pharmacists and healthcare professionals

as mentioned above) and partners who assist in providing and enhancing our services. These entities have limited access to your information adhere to strict confidentiality and data security standards to ensure the protection of your information and may only use your information to help us operate, provide and advertise the Site and our services in accordance with our instructions to them.

This may include technology hosts, providers of digital advertising services, providers of payment services, providers of delivery services, providers of platform and website hosting, providers of marketing and sales software solutions, mailing houses and identity verification partners. In these circumstances, we will ensure that the personal information we share is properly protected and is only used in accordance with this Policy.

Business Transfers

In the event of certain business transfers which includes mergers, acquisitions and other relevant transfers, your information may be transferred as part of the business assets to ensure continuity of service and maintain a seamless user experience.

Anonymised Information

We may disclose aggregated statistics about visitors to the Site and other metrics in order to describe the Site and the services on it to commercial partners, prospective partners, investors, advertisers, sponsors and other reputable third parties and for other lawful purposes, but these statistics will not include your personal data.

Legal Obligations

We may disclose information in response to requests by the courts of a competent jurisdiction, or as a result of other regulatory requirements, including situations where disclosure is necessary to comply with applicable laws or regulations, safeguard the rights, privacy, and security of our users, or in order to enforce or apply our Terms of Use and other agreements, or to protect the rights, property, or safety of Us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

User Consent

In circumstances not covered by 5.6 above, we share your information only with your consent, allowing you control over the sharing of their information, respecting individual choices and preferences. By continuing to browse our Site, you are consenting to the terms of this Policy.

Group Companies

We may share some of the information that we collect, with our corporate affiliates or group companies that help us conduct business. The information we share with our group companies will only be used to provide you with the service and for any other purpose we have described in this Policy.

International Transfers

certain instances, your information may be transferred across international borders as part of our operations. This includes

scenarios where our service providers, partners, or servers are located in different countries. These are for the purposes outlined above.

To safeguard your information during international transfers, we implement protective measures consistent with data protection standards. These measures may include the use of encryption, contractual agreements with data processors, or reliance on internationally recognised frameworks that ensure an adequate level of protection for your data.

Should we transfer personal data to countries outside the EEA and the UK that do not benefit from an adequacy decision, we put in place appropriate safeguards to protect your personal data – e.g. the standard contractual clauses as amended by the UK Addendum, unless a relevant exemption applies.

We are committed to compliance with international data protection laws governing cross-border data transfers. This commitment extends to adhering to applicable frameworks, regulations, and mechanisms that ensure the lawful and secure transfer of user information across borders.

How We Use Cookies & Other Tracking Technologies

Our use of cookies and other tracking technologies is governed by our Cookies Policy. We are committed to transparency in our data practices, and you can find detailed information about the types of cookies used, their purposes, and your control options in our Cookies Policy. Please take a moment to review our Cookies Policy. Your continued use of our site

indicates your acceptance of the terms outlined in our Cookies Policy.

How We Use Third-Party Links & Services

Our Site may integrate and use third-party services (such as Stripe and PayPal) to enhance your experience and provide additional functionalities and the privacy and security of your data remain a priority in these collaborations. These third parties may have their own privacy policies and terms of service, and we encourage you to review them to understand how they collect, use, and handle your information. Integration with third-party services is designed to enrich your interaction with our Site, and the privacy and security of your data remain a priority in these collaborations.

You have the option to choose whether to engage with third-party products and services integrated into our Site. Your decision to interact with these third-party services is voluntary, and you can exercise control over your engagement with them. We respect your choice and provide clear pathways for you to opt-in or opt-out of interactions with third-party links and services. However, some third-party products and services may be necessary in order for you to use the services on our Site.

How We Protect Your Information

We prioritise the security of your information by implementing robust security measures. These measures are designed to safeguard your data from unauthorised access, disclosure,

alteration, loss and destruction, ensuring the confidentiality and integrity of your information. Measures involve:

regular security audits: including periodic reviews and security audits to evaluate and enhance our Site's security. These assessments identify potential vulnerabilities, address emerging threats, and ensure that our security measures align with evolving industry standards and best practices.

employee training: whereby our commitment to data security extends to the provision of comprehensive data protection training for our employees. This training ensures a collective commitment to upholding the highest standards of data privacy and security of your information.

incident response plans: where, in the event of a potential data breach, we have established incident response plans which outline procedures for promptly detecting, responding to, and mitigating the impact of security incidents. Our response is aimed at minimising potential harm, resolving issues promptly, and maintaining the trust and confidence of our users.

password protection: you will secure your account with a password on valid devices. We enforce minimum standards for passwords to ensure they meet a certain level of strength. It is your responsibility to keep your password to your device safe and confidential.

security encryption: the personal data that we collect on our Site is stored in our secure database and is securely encrypted at a database level.

How Long We Store Your Information

We only store your information for the duration necessary to fulfil its intended purpose. The determination of the retention period is based on the necessity of processing the information for the services provided on our Site and other legitimate business purposes. Most of our retention periods are determined on the basis of this general rule.

The specific timeframes for retaining various data types are established by taking into consideration our legal requirements, contractual obligations, and user consent. These retention periods are outlined below and are periodically reviewed to ensure continued relevance and compliance.

Purpose of Processing	Retention
Information which is used to provide you with the services on our Site.	Retained for the lifetime of your account with us. Specific medical information will be retained in accordance with current legal requirements and professional best practice.
Information which is used for regulatory and legal compliance and obligations.	Retained to extent necessary to comply with our legal obligations.
Information which is used for other legitimate purposes.	Retained for other legitimate purposes such as investigating potential violations for our policies or Terms of Use, promoting safety, security and integrity and protect us and our rights, property or the Site.

Upon expiration of the data retention period, we employ secure methods for data handling, which may include deletion or anonymisation. This ensures that data no longer needed for its original purpose is responsibly managed, reducing the risk of unnecessary exposure and aligning with privacy principles.

How We Use Automated Decision-Making

We are committed to transparency in our data practices. At present, there is no automation of decision making across the Site. From entering your information to concluding your meeting with the pharmacist or healthcare professional, all decisions using your data are made by a human.

Your Rights & Choices

Certain privacy laws (which includes the General Data Protection Regulation) provide users with rights and choices related to their personal information. In consistency with those laws, we give you the choice of accessing, editing, or removing certain information as well as choices about our communications with you. Subject to applicable law, you may have some rights with respect to your personal information such as:

Right	What you can do
Right to be informed	You have the right to be informed about the collection and use of your personal data, as detailed in this Policy. Your personal data can be accessed through your account page on the Site or by contacting us via the methods set out in this Policy.
Right to access	You have the right to access and receive a copy of your personal data and supplementary information. Most of your information will be accessible on the Site or by contacting us via the methods set out in this Policy, you also have the right to submit a “data subject access request” which enables you to receive a copy of the personal data we hold about you.
Right to portability	You have the right to data portability, which allows individuals to obtain and reuse their personal data for their own purposes across different services.
Right to rectification	You have the right to have inaccurate personal data rectified, or completed if it is incomplete. This can be done through your account page on the Site or by contacting us via the methods set out in this Policy.
Right to restrict processing	You have the right to request the restriction or suppression of your personal data where you have a specific reason for this. In this

Right	What you can do
Right to deletion/erasure	<p>situation we may be permitted to store your personal data, but not use it, which will affect your ability to use the services on our Site.</p> <p>You have the right to have personal data erased where there is no lawful basis for us to continue to process it, or where you have successfully exercised your right to object (below). In certain situations we may not be able to comply with your request for erasure for specific legal reasons (such as maintenance of patient medical records) which will be notified to you, if applicable at the time of your request. You can request the deletion/erasure of your personal information by contacting us via the methods set out in this Policy.</p>
Right to object	<p>You have the right to object to the processing of your personal data at any time depending on certain circumstances.</p> <p>You have rights in relation to automated decision-making (making a decision solely by automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about an individual), this could be part of the automated decision-making process. You are able to challenge decisions or request human involvement by contacting us via the methods set out in this Policy.</p>
Right relating to automated decision making	<p>You have rights in relation to automated decision-making (making a decision solely by automated means without any human involvement) and profiling (automated processing of personal data to evaluate certain things about an individual), this could be part of the automated decision-making process. You are able to challenge decisions or request human involvement by contacting us via the methods set out in this Policy.</p>

We try to respond to all legitimate requests within one month of receiving the request. Occasionally, it may take longer if the request is complex or you have made a number of requests. In this case we will ensure to communicate this to you and keep you updated. If you wish to make a request or exercise any of your rights mentioned above, you should contact My Local Surgery's Data Protection Officer at the address shown in section 16 "How You & Us Communicate" of this Policy below.

Complaints

As part of your rights afforded under the UK GDPR, you are entitled to file a complaint with the Information Commissioner's Office (ICO) if you believe that your data protection rights have been violated. More information about

your legal rights can be found on the ICO website at <https://ico.org.uk/for-the-public/>.

Your Responsibilities

We emphasise the importance of keeping your personal information current and correct. You are encouraged to regularly review and update your information to ensure its accuracy and relevance.

You must prioritise the safeguarding of your account credentials and should refrain from sharing your credentials and adopt secure password practices, such as using strong, unique passwords as prescribed by our Site.

We urge you to familiarise yourself with the privacy policies and terms of relevant third parties associated with our Site. This includes external services, partners, and integrated functionalities. Reviewing third-party policies ensures that you are aware of how your information may be handled beyond our Site.

If you are a registered pharmacist or healthcare professional on our Site, you may receive certain personal data and will have legal obligations in respect of such data. Your privacy responsibilities, including when you act as an independent data controller, may go further than those set out in this Policy in which case any additional obligations are laid out in the Pharmacist and Healthcare Professional Terms and Conditions.

Changes to Privacy Policy

This Policy is subject to change at any time, we will revise the “Last Updated” date at the top of this Policy. By continuing to use the Site, you acknowledge and agree that you it is your responsibility to review this Policy and we encourage you to do so to stay informed about how we are helping to protect the information we collect. It is your responsibility to be aware of any changes and your continued use of the Site shall constitute your agreement to this Policy and any updates.

If you do not agree to the revised terms, you may discontinue using the services on the Site and the Site itself. If you have any questions about this Policy, please see section 16 “How You & Us Communicate” below.

How You & Us Communicate

For general enquiries, you can reach out to us using the “Contact Us” form available on our Site (<https://mylocalsurgery.co.uk/contact-us>), or through the MLS Chat function on the Site.

For enquiries related to this Policy or our approach in relation to data protection and privacy you can reach out to us at [technical@mylocalsurgery.co.uk]. We value open communication and are committed to addressing any concerns or questions you may have regarding our terms.

Additionally, for data protection requests and concerns, users have the right to contact the ICO, the UK's supervisory authority for data protection matters. More information about your legal rights can be found on the ICO website at <https://ico.org.uk/for-the-public/>.

For queries specifically related to cookies and their usage, users are encouraged to refer to our [Cookies Policy](#).