

POLICY60 Privacy Notice (GDPR)

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1. PURPOSE

This Privacy Notice sets out how City Fertility handles, stores, uses and shares your personal information when it collects such information from you or from a third party.

The Data Controller is City Fertility Ltd, based at 16 St John Street, EC1M 4NT, London, UK.

2. AREA OF OPERATION

This SOP is relevant for CITY FERTILITY only (listed as „clinic” in a text below).

3. PRIVACY NOTICE

3.1. What do we collect and how we use personal data

City Fertility processes personal data of individuals and these include names, addresses, telephone numbers, email addresses, financial details, employment details, health records and educational details. City Fertility processes personal data to enable it to provide health services to its service users, to maintain accounts and records, promote its services and manage and support employees.

City Fertility does not sell personal information to anyone and only shares it with third parties who are facilitating the delivery of City Fertility’s services.

3.2. How do we share your personal information

City Fertility may need to share your personal information with other organisations. Where such sharing is necessary, we will comply with the requirements of the GDPR on data sharing and the requirements of the HFEA Act. The types of organisations / groups that we may share personal data with are set out below:

- a) Healthcare professionals
- b) Social & welfare organisations
- c) Government departments
- d) Business associates
- e) Representatives of the person whose personal data is processed
- f) Suppliers and service providers (including testing laboratories, pharmacies, satellite clinics, the NHS and gamete donation banks)
- g) Solicitors
- h) Financial organisations and Debt collection agencies
- i) Current, past and prospective employees

3.3. Your rights as a Data Subject

You have the following rights in relation to your personal information which you can exercise by writing to the Data Protection Officer at the following address:

Data Protection Officer
City Fertility Ltd
16 St John Street

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EC1M 4NT
London

- a) Right to request access to your personal information and information relating to our use and processing of your personal information
- b) Right to request that we restrict our use of your personal information
- c) Right to receive your personal information in a structured commonly-used and machine-readable format or transmit the data directly to another Data Controller
- d) Right to object to the processing of your personal information for certain purposes such as direct marketing and profiling
- e) Right to request your personal information to be erased where it is no longer necessary for the purpose for which it was collected
- f) Right to withdraw your consent to the use of your personal information where the processing of your data is based on consent

3.4. How long we retain your personal information

We will retain your personal information for no longer than necessary taking into account the following aspects:

- a) The purpose(s) for which we are processing your personal information, such as whether it is necessary to continue to store that information in order to perform our obligation under a contract
- b) Whether we have any legal obligation to continue to process your personal information, such as any recordkeeping obligations imposed by an applicable law
- c) Whether we have a business reason to continue to process your personal information

3.5. How do we secure your personal information

We take appropriate technical and organisational measures to secure your personal information and protect it against unauthorised or unlawful processing as well as against its accidental loss or destruction or damage including:

- a) Using secure servers to store your personal information
- b) Using Secure Sockets Layer (SSL) software or other similar encryption technologies to encrypt confidential data in transit and at rest
- c) Verifying the identity of individuals that access your personal information
- d) Providing access to the minimum personal data necessary, using appropriate restrictions and anonymisation or pseudonymisation whenever possible

3.6. Transfer of your personal information to other countries

We may need to transfer your personal information to countries outside the European Economic Area (EEA) or to an international organisation from time to time.

3.7. Our use of cookies and similar technologies

Our Site may use “cookies” to enhance User experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they

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do so, note that some parts of the Site may not function properly. Other technologies we use are detailed below.

3.8. Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

3.8.1 Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

3.8.1.1 Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilises the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected:

Cookies and Usage Data.

Place of processing:

United States – [Privacy Notice](#) – [Opt Out](#). Privacy Shield participant.

3.8.1.2 Facebook Ads conversion tracking (Facebook, Inc.)

Facebook Ads conversion tracking is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Website.

Personal Data collected:

Cookies and Usage Data.

Place of processing:

United States – [Privacy Notice](#). Privacy Shield participant.

3.8.1.3 Twitter Analytics (Twitter, Inc.)

Twitter Analytics is an analytics service provided by Twitter, Inc. that connects data from the Twitter advertising network with actions performed on this Website.

Personal Data collected:

Cookies and Usage Data.

Place of processing:

United States – [Privacy Notice](#). Privacy Shield participant.

3.8.2 Contact

3.8.2.1 Book appointment (on this Website)

By filling in the contact form with their Data, the User authorises this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the title of the form. The data may further be used to process onward requests by the user.

Personal Data collected:

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First name, last name, date of birth, address, city, country, telephone number, email and various interests in treatment options.

3.8.2.2 Call me back (on this Website)

Users that provided their phone number might be contacted for commercial or promotional purposes related to City Fertility, as well as for fulfilling support requests. We may also use text messaging to remind you of your appointments or ask you to get in touch with us. To opt out of text messaging please contact us.

Personal Data collected:

Full name, email, telephone number, various interests in treatment options and enquiry details.

3.8.2.3 Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable this Website to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Website. For redundancy the locations of these servers are distributed within Czech Republic.

3.8.3 Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website.

The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

3.8.3.1 Facebook Like button and social widgets (Facebook, Inc.) – including Instagram

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected:

Cookies and Usage Data.

Place of processing:

United States – [Privacy Notice](#). Privacy Shield participant.

3.8.3.2 Twitter Tweet button and social widgets (Twitter, Inc.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data collected:

Cookies and Usage Data.

Place of processing:

United States – [Privacy Notice](#). Privacy Shield participant.

3.8.3.3 YouTube (Google Inc.)

YouTube is a video hosting platform. Data will be collecting on user usage.

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Personal Data collected:

Cookies and Usage Data.

Place of processing:

United States – [Privacy Notice](#) – [Opt Out](#). Privacy Shield participant.

3.8.3.4 Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

3.8.3.5 Remarketing and behavioural targeting

This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioural targeting activity.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the [Network Advertising Initiative opt-out](#) page.

Facebook Custom Audience (Facebook, Inc.)

Facebook Custom Audience is a remarketing and behavioural targeting service provided by Facebook, Inc. that connects the activity of this Website with the Facebook advertising network.

Personal Data collected:

Cookies and email address.

Place of processing:

United States – [Privacy Notice](#) – [Opt Out](#). Privacy Shield participant.

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Facebook, Inc. that connects the activity of this Website with the Facebook advertising network.

Personal Data collected:

Cookies and Usage Data.

Place of processing:

United States – [Privacy Notice](#) – [Opt Out](#). Privacy Shield participant.

AdWords Remarketing (Google Inc.)

AdWords Remarketing is a remarketing and behavioural targeting service provided by Google Inc. that connects the activity of this Website with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected:

Cookies and Usage Data.

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Place of processing:

United States – [Privacy Notice](#) – [Opt Out](#).

Remarketing through Google Analytics for Display Advertising (Google Inc.)

Google Analytics for Display Advertising is a remarketing and behavioural targeting service provided by Google Inc. that connects the tracking activity performed by Google Analytics and its Cookies with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected:

Cookies and Usage Data.

Place of processing:

United States – [Privacy Notice](#) – [Opt Out](#). Privacy Shield participant.

3.9. Questions and Concerns

If you have any question or concern on how we collect, handle, store or secure your personal information, contact our Data Protection Officer using the details below:

Data Protection Officer
City Fertility Ltd
16 St John Street
EC1M 4NT
London

You also have the right to file a complaint with the Supervisory Authority and for the UK this is the Information Commissioner’s Office (ICO). The ICO’s contact details are:

Information Commissioner’s Office,
Wycliffe House,
Water Lane, Wilmslow,
Cheshire, SK9 5AF,
Tel: 0303 123 1113.

4. INITIALS & ABBREVIATIONS

N/A

5. RECORDS

N/A

6. REGULATORY BACKGROUND

The City Fertility is required to adhere to the regulations set out in law by Statutory Instrument (SI) 2001: 3968 in English Clinic, The Human Fertilisation and Embryology Act of 1990 (and any subsequent revisions), and by the European Community Directives 2004/23/EC, 2006/17/EC and 2006/86/EC and any subsequent revisions. It is also required to adhere to the guidelines for good practice as set out in the current Human Fertilisation and Embryology Authority’s (HFEA) “Code of

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Practice” and the Care Quality Commission’s Compliance Standards (2010) regulations as appropriate, and any subsequent revisions. The City Fertility also adheres to the ISO 9001:2015 standards for Quality Management Systems.

7. FORMS AND TEMPLATES

N/A