

**LDPATH LIMITED
PRIVACY POLICY**

LDPATH Limited cares about your privacy. We collect and use your or your service users' personal data only as it might be needed for us to deliver to you our services, applications and most importantly, care to our service users (collectively, our "Services").

Personal data includes information such as:

- Name
- Address
- Telephone number
- Date of birth
- Sex
- Special category data, particularly that of clinical relevance.
- Other data collected that could directly or indirectly identify you.

This Privacy Policy is intended to describe how and what data we collect, and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process.

What information do we collect and when do we collect it?

- when you directly or indirectly create an account with us or purchase any of our Services (e.g. billing information, including name, address, credit card number, government identification);
- when you directly or indirectly submit a Request Form (RF) requesting our services;
- request assistance from our support team
- complete contact forms or request newsletters or other information from us
- participate in contests and surveys, apply for a job, or otherwise participate in activities we promote that might require information about you.

However, we also collect additional information when delivering our Services to you to ensure necessary and optimal performance. These methods of collection are not as obvious, so below we highlight and explain what these might be and how they work:

Account related information is collected in relation to your use of our Services, such as application usage, requests, and customer service requests and notes or details explaining what you asked for and how we responded.

Data about Usage of Services is automatically collected when you use and interact with our Services, including metadata and log files.

Supplemented Data may be received about you from other sources, including public databases and third parties from whom we have purchased data.

Special category data is supplied by you or your clinician in order for us to provide you with industry standard reports. We store this data at high security and retain it for only as long as we require it to provide the requested services and adhere to industry regulations.

How we utilise information

We endeavor to minimise the data we collect and limit its use and purpose to only that:

- for which we have been given permission,
- as necessary to deliver the Services you purchase or interact with,
- as we might be required or permitted for legal compliance or other lawful purposes.

Often, the data we collect is aggregated or statistical data about how groups of individuals use our Services, and is not linked to any personal data, but to the extent it is itself personal data, or is linked or linkable to personal data, we treat it accordingly.

Sharing with trusted third parties

We may share your personal data with affiliated companies within our operational network, with third parties with which we have partnered to allow you to integrate their services into our own Services, and with trusted third party service providers as necessary for them to perform services on our behalf, such as:

- processing payments
- performing analysis of our Services

We only share your personal data as necessary for any third party to provide the services as requested or as needed on our behalf. These third parties (and any subcontractors) are subject to strict data processing terms and conditions and are prohibited from using, sharing or retaining your personal data for any purpose other than as they have been specifically contracted for or without your consent.

LDPath safely and securely share some data with selected substantive researchers, analysts and organisations who help us make sense of complex information and to develop our own pioneering diagnostic services. When doing this LDPath comply with all relevant legislation including but not limited to the Data Protection Act 2018 and the NHS National Data Opt Out Policy. We only share what's needed for each piece of research and wherever possible, information is removed so that you can't be identified. Should you or your service users wish to Opt Out, the clinician responsible or organisation responsible for your care can easily do so by one of the methods described in the "Contact Us" section below

Communicating with you

We may contact you directly or through a third party service provider regarding services you have signed up or purchased from us. We may also contact you with offers for additional services we think you'll find valuable if you give us consent, or where allowed.

- Email
- SMS messages
- Telephone calls
- Fax

If you would like to request that all or some of your personal information be removed from

our database please use one of the methods described in the “Contact Us” section below

Transfer of personal data abroad

Our services are based in multiple secure locations within the EEA. If you utilise our Services from a country other than the country where our servers are located, your communications with us may result in transferring your personal data across international borders. In these cases, your personal data is handled according to this Privacy Policy.

Compliance

We cooperate with government, legislative bodies and regulators including but not limited to the Care Quality Commission to enforce and comply with the law. At our sole discretion, we will disclose information about you to such a body if we believe necessary to respond to claims or legal processes, to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.

Where we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

How you can access, update or delete your data

To easily access, view, update, delete or port your personal data (where available), or to update your subscription preferences, please sign into your Account and visit “Account Settings.”

If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honored only to the extent it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

If you are unable for any reason to access your Account Settings or our Privacy Center, you may also contact us by one of the methods described in the “Contact Us” section below.

How we secure, store and retain your data

We follow generally accepted standards to store and protect the personal data we collect, both during transmission and once received and stored, including utilisation of encryption where appropriate.

We retain personal data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- mandated by law, contract or similar obligations applicable to our business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights; or
- needed to maintain adequate and accurate business and financial records.

If you have any questions about the security or retention of your personal data, you can contact us at governance@ldpath.com.

Changes in our Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Privacy Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

Data Protection Authority

If you are a resident of the European Economic Area (EEA) and believe we maintain your personal data subject to the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority the ICO.

www.ico.gov.uk

Contact us

If you have any questions, concerns or complaints about our Privacy Policy, our practices or our Services, you may contact our Office of the DPO by email governance@ldpath.com. In the alternative, you may contact us by either of the following means:

- By Mail: LD Path Ltd, 6 St John's Place, London EC1M 4NP
- By Phone: 0207 336 0921

We will respond to all requests, inquiries or concerns within thirty (30) days.

