

# Privacy Policy

## Tawazun Health

1. This privacy policy applies between you, the User of this Service and “Tawazun Health”. The owner and provider of this Service is Tawazun Health, a limited company registered in England (company number 11713177). Tawazun Health is a data controller, with ICO registration number ZB051425, and takes the privacy of your information very seriously. This privacy policy applies to our use of all Data collected by us or provided by you in relation to your use of our Service.

2. In this privacy policy, the following definitions are used:

### Definitions and interpretation

Data collectively all information that you submit to Tawazun Health via the Website. This definition incorporates, where applicable, the definitions provided in the UK GDPR.

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UK GDPR UK GDPR means Regulation (EU) 2016/679 General Data Protection Regulation as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019.

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“We” and “Us” Tawazun Health, whose registered address is 67 Westow Street, London, SE19 3RWN.

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3. In this privacy policy, unless the context requires a different interpretation:

- a. the singular includes the plural and vice versa.
- b. references to sub-clauses, clauses, schedules, or appendices are to sub-clauses, clauses, schedules, or appendices of this privacy policy.
- c. a reference to a person includes firms, companies, government entities, trusts and partnerships.
- d. “including” is understood to mean “including without limitation”.
- e. reference to any statutory provision includes any modification or amendment of it.
- f. the headings and sub-headings do not form part of this privacy policy.

### Scope of this privacy policy

4. This privacy policy applies only to the actions of Tawazun Health and Users with respect to this Service.

5. For purposes of UK GDPR, Tawazun Health is the “data controller”. This means that Tawazun Health determines the purposes for which and the way your Data is processed.

## **Data collected**

6. We may collect the following Data, which includes personal Data, from you:

- a. Identity information (e.g. full name)
- b. Date of birth
- c. Contact information (e.g. telephone number, email/postal address)
- d. Case/session notes
- e. Health data
- f. Newsletter preferences
- g. Any relevant categories of personal data.

7. in each case, in accordance with this privacy policy.

## **How We collect Data**

8. We collect Data in the following ways:

- a. data is given to us by you.

## **Data that is given to us by you**

9. Tawazun Health will collect your Data in several ways, for example:

- a. By taking notes during an appointment
- b. When you pay for a product or service through our payment gateway
- c. When you sign up to a newsletter
- d. When you use the MY365.me app

10. in each case, in accordance with this privacy policy.

## **Our use of Data**

11. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Service. Specifically, Data may be used by us for the following reasons:

- a. To provide access to our Service.
- b. To process your payment.
- c. To provide you with secure access to your account.
- d. To improve our Service.
- e. To send reports from the service purchased

12. in each case, in accordance with this privacy policy.

13. We may use your Data for the above purposes if We deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed “Your rights” below).

14. For the delivery of direct marketing to you via e-mail, we’ll need your consent, whether via an opt-in or soft-opt-in:

a. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and We are marketing similar products/services). Under “soft opt-in” consent, We will take your consent as given unless you opt-out.

b. for other types of e-marketing, We are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we’ll provide.

c. if you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed “Your rights” below.

#### **Who We share Data with**

15. We may share your Data with the following groups of people for the following reasons:

Third Party What do they do?

General practitioners, and specialist physicians Health care

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16. in each case, in accordance with this privacy policy.

#### **Keeping Data secure**

17. We will use technical and organisational measures to safeguard your Data, for example:

a. We store your data on secure servers.

18. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: [louise.campbell@tawazunhealth.com](mailto:louise.campbell@tawazunhealth.com)

19. If you want detailed information from **Get Safe Online** on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org) **Get Safe Online** is supported by HM Government and leading businesses.

#### **Data retention**

20. Unless a longer retention period is required or permitted by law, We will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.

21. Even if We delete your Data, it may persist on backup or archival media for legal, tax or *regulatory purposes*.

### **Your rights**

22. You have the following rights in relation to your Data:

- a. Right to access– the right to request (i) copies of the information We hold about you at any time, or (ii) that We modify, update or delete such information. If We provide you with access to the information We hold about you, We will not charge you for this, unless your request is “manifestly unfounded or excessive.” Where We are legally permitted to do so, We may refuse your request. If We refuse your request, We will tell you the reasons why.
- b. Right to correct– the right to have your Data rectified if it is inaccurate or incomplete.
- c. Right to erase– the right to request that We delete or remove your Data from our systems.
- d. Right to restrict our use of your Data– the right to “block” us from using your Data or limit the way in which We can use it.
- e. Right to data portability– the right to request that We move, copy or transfer your Data.
- f. Right to object– the right to object to our use of your Data including where We use it for our legitimate interests.

23. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [louise.campbell@tawazunhealth.com](mailto:louise.campbell@tawazunhealth.com)

24. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner’s Office (ICO). The ICO’s contact details can be found on their website at <https://ico.org.uk/>.

25. It is important that the Data We hold about you is accurate and current. Please keep us informed if your Data changes during the period for which We hold it.

### **Changes of business ownership and control**

26. Tawazun Health may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Tawazun Health. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

27. We may also disclose Data to a prospective purchaser of our business or any part of it.

28. In the above instances, We will take steps with the aim of ensuring your privacy is protected.

### **General**

29. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where We reasonably believe your rights will not be affected.

30. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

31. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

32. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts. Changes to this privacy policy

33. Tawazun Health reserves the right to change this privacy policy as We may deem necessary from time to time or as may be required by law. Please direct any questions you have to us by email at [louise.campbell@tawazunhealth.com](mailto:louise.campbell@tawazunhealth.com).

34. Last Updated: 21-12-2022