



Trauma App

Services Privacy Policy

Daysix Medical Ltd

BACKGROUND:

In this Policy, unless specified otherwise, words and phrases shall have the same meanings as specified in Our Daysix Medical™ Services Terms and Conditions.

DAYSIX MEDICAL LTD, a company incorporated in Scotland (No. SC562997) and having its Registered Office is at 4-8 Lady Lawson Street, Edinburgh, Scotland, EH3 9DS understands that your privacy, and the privacy of your employees, clinicians and patients as is important to you and that you care about how personal data is used and shared. We respect and value the privacy of Customers and their employees, clinicians and patients and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when agreeing to the Services Licence Agreement. If you do not accept and agree with this Privacy Policy, you must stop using Our **"Services"** (being Our Professional Services and/ or Software Services) immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

| | |
|---------------------|---|
| "Cookie" | means a small text file placed on your computer or device by Our Services when you visit certain parts of Our Services and/or when you use certain features of Our Services. Details of the Cookies used by Our Services are set out in Part 14, below; |
| "Cookie Law" | means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003; and |
| "We/Us/Our" | means the said Daysix Medical Ltd (as above). |

2. Information About Us

- 2.1 Our Services are owned and operated by Us.
- 2.2 Our Data Protection Officer is: Tom Montgomery
- 2.3 Email address: hello@thetraumaapp.com

3. What Does This Policy Cover?

- 3.1 This Privacy Policy applies only to Our use of data gathered by Us in any Customer's ("you/ your") use of Our Services.

4. What Is Personal Data?

- 4.1 Personal data is defined by the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) (where applicable in relation to the storage retention and processing of EU personal data), the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the "UK GDPR"), 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 the Data Protection Act 2018 (collectively, **"the Data Protection Legislation"**) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

4.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, a data subject as an individual has the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data We hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold. Please contact Us using the details in Part 15 to find out more. (We only hold personal data for certain periods of time, as explained in Part 8 but if you would like Us to delete it sooner, please contact Us using the details in Part 15). Please note that deletion of certain personal data may prevent Our Services from functioning;
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. For more information please see Part 7.

5.2 For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 15.

5.3 It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep Us informed as long as We have that data.

5.4 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

5.5 If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5.6 We would welcome the opportunity to resolve your concerns Ourselves, however, so please contact Us first, using the details in Part 15. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office details of which can be found here <https://ico.org.uk/>.

6. What Data Do We Collect and How?

6.1 Depending upon your use of Our Services, We collect and hold some or all of the personal

and non-personal data set out below, using the methods also set out in the table. Please also see Part 14 for more information about Our use of Cookies and similar technologies.

6.2 We will request, collect, retain, store and process certain “Special Category” data when providing Our Services. Special Category data is:

| Categories of individuals | Data Collected | Special Category Data Collected | How We Collect the Data/ Lawful Basis |
|---------------------------|---|--|--|
| Patients | <ul style="list-style-type: none"> ● Patient Name ● Patient Date of Birth ● Age (Number) ● Date and Time of accident ● Gender ● Unique numeric patient identifier (e.g. CHI Number) ● A detailed chronology of clinical interventions in the Emergency department during trauma episode to quantify the physical condition of the trauma patient | <p>Patient Physical / Mental Health or Condition</p> <p>If the patient is a child the data collected will be categorised as child personal data.</p> | <p>Required for providing and administering Our Services.</p> <p>Patient data is entered by clinicians working in the emergency department of a hospital during patient treatment. Data is purely collected for the purposes of providing and recording patient care.</p> <p>No Data pertaining to patients is held by Us or transferred to any third party processor, any patient data collected as part of Our Services is transferred and held on the Customer's servers/ databases.</p> |
| Clinicians | <p>Clinician Name Clinician Base Clinician Professional Code Clinician Role</p> | None | <p>Required for providing and administering Our Services</p> <p>Data is entered by hospital administration staff and is required for accurate recording of medical treatment and to provide access to Our Services for hospital staff/clinicians.</p> |
| Patient's Next of Kin | <ul style="list-style-type: none"> ● Next of kin name ● Next of kin contact number | None | Required for providing and administering Our Services |

| Categories of individuals | Data Collected | Special Category Data Collected | How We Collect the Data/ Lawful Basis |
|---------------------------|---|---------------------------------|---|
| | <ul style="list-style-type: none"> Next of kin location (in department) | | <p>Data is entered by clinicians who are required to add next of kin details to the medical record in line with the standard provision of care to patients.</p> <p>No Data pertaining to a patient's next of kin is held by Us or transferred to any third party processor, any next of kin data collected as part of Our Services is transferred and held on the Customer's servers/ databases.</p> |
| Customer Employees | <ul style="list-style-type: none"> Contact information including: email addresses and telephone numbers Business information including: job title and profession. | None | <p>Required for agreeing /providing Our Services and contacting the Customer in relation to Our Services</p> <p>Data is collected from the individual when engaging in discussions and enquiry about using Our Services.</p> |

- a) personal data revealing racial or ethnic origin;
- b) personal data revealing political opinions;
- c) personal data revealing religious or philosophical beliefs;
- d) personal data revealing trade union membership;
- e) genetic data;
- f) biometric data (where used for identification purposes);
- g) data concerning health;
- h) data concerning a person's sex life;
- i) personal data pertaining to children (any person under the age of 18 years); and
- j) data concerning a person's sexual orientation.

6.3 We will not request, collect, retain, store and process any "Criminal Conviction" when providing Our Services, Criminal Conviction data is:

- a) personal data relating to criminal convictions and offences or related security

measures including:

- i) criminal activity;
- ii) allegations;
- iii) investigations;
- iv) proceedings.
- v) unproven allegations
- vi) information relating to the absence of convictions.
- vii) personal data about penalties;
- viii) conditions or restrictions placed on an individual as part of the criminal justice process; or
- ix) civil measures which may lead to a criminal penalty if not adhered to.

1.2 Under the Data Protection Legislation, We must always have a lawful basis for using personal data. The following table describes how We collect and use your personal data, and Our lawful bases for doing so:

2. How Do We Use Your Personal Data?

- 2.1 With your permission and/or where permitted by law, in addition to the uses narrated in the table in Part 6 above We may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers and updates on Our products and Services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.
- 2.2 We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in Part 15.
- 2.3 If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows Us to do so.
- 2.4 In some circumstances, where permitted or required by law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

3. How Long Will We Keep Your Personal Data?

We do not keep personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

We retain personal data pertaining to a Customer and its employees and clinicians for as long as we have an Agreement with the Customer and for a period of 3 years thereafter. Data will then be deleted or anonymised.

No Data pertaining to a patient or a patient's next of kin is held by Us, any patient or next of kin data collected as part of Our Services is transferred and held on the Customer's servers/databases.

4. **How and Where Do We Store or Transfer Your Personal Data?**

- 4.1 We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.
- 4.2 We will transfer some of your personal data to the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.
- 4.3 We will transfer some of your personal data to countries outside of the UK and the EEA. These are known as "third countries". We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will transfer personal data to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner's Office; or

We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the Information Commissioner's Office.

- 4.4 Please contact Us using the details below in Part 15 for further information about the particular data protection safeguards used by Us when transferring your personal data to a third country.
- 4.5 The security of your personal data is essential to Us, and to protect your data, We take a number of important measures, including the following:
 - a) limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
 - b) procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where We are legally required to do so;

5. **Do We Share Your Personal Data?**

- 5.1 If We sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.
- 5.2 In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 5.3 We may share your personal data with other companies in Our group for administration and company management purposes. This includes subsidiaries.
- 5.4 We sometimes contract with the following third parties to process data to supply certain products and services and process data on Our behalf:

| Recipient | Activity Carried Out | Sector | Location of Data |
|---|---|--|--|
| Monday.com Ltd. | When using Our application as part of the Services for the first time there is an optional form Users can complete (Users can skip this form). This form feeds Us names and email address of Users that complete this form which We add to Our Customer Relationship Management system, this data is used to identify how the Services are being used and for contacting Users in relation to information, news, and offers and updates on Our products and Services. | Customer Relationship Management Platform Services | <p>Globally including Israel, the United States of America, the United Kingdom, Australia, the Ukraine and Guatemala</p> <p>For more information see Monday.com safeguarding measures see the link below:</p> <p>https://monday.com/trustcenter/privacy#:~:</p> <p>We have entered into Monday.com's Data Processing Addendum</p> |
| The Rocket Science Group LLC trading as Mailchimp | When using Our application as part of the Services for the first time there is an optional form Users can complete (Users can skip this form). This form feeds Us names and email address of Users, this data is used for contacting Users in relation to information, news, and offers and updates on Our products and Services. | Marketing, Automation & Email Platform | <p>Globally including the United States of America.</p> <p>For more information see Mailchimp's safeguarding measures see the link below:</p> <p>https://mailchimp.com/legal/data-processing-addendum/</p> |
| Microsoft Inc. | Directory services developed by Microsoft for Windows domain networks, for organising and managing users, their attributes and group membership, | Active Directory Domain Services | <p>Europe, Middle East, and Africa (EMEA)</p> <p>No personal data pertaining to Customers, Users, Patients or Patient's next of kin is transferred to any third country including the</p> |

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|-------------|--|--------------------|--|
| | <p>computer accounts and network resources.</p> <p>It is Used for authenticating Users accessing the Services</p> | | <p>Middle East or Africa as part of Our Use of Microsoft Inc.'s services. Customers' own Entra ID services from their own Microsoft Azure account is utilised when accessing the Services.</p> |
| Google Inc. | <p>We use Google's analytics services to track usage statistics, site performance, errors and exceptions for the purpose of improving site functionality and reliability</p> | Analytics services | <p>For more information on Our use of cookies and Analytics see Part 14.</p> |

5.5 If any of your personal data is shared with a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party's obligations under the law, as described above in Part 9.

5.6 If any personal data is transferred outside of the UK/European Union, We will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK/European Union and under the Data Protection Legislation, as explained above in Part 9.

6. How Can I Control My Personal Data?

6.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Services, you may be given options to restrict Our use of your personal data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails).

6.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

7. Can I Withhold Information?

7.1 You may restrict Our use of Cookies. For more information, see Part 14.

7.2 We only collect personal data that is required in terms of Part 6. If a data subject withholds certain information/ personal data We may not be able to provide Our Services or certain features of Our Services may not function fully or as intended.

8. How Can I Access My Personal Data?

8.1 If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is

known as a “subject access request”.

- 8.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.
- 8.3 There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.
- 8.4 We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

9. How Do We Use Cookies?

- 9.1 Certain Services may place and access certain Cookies on your computer or device. We use Cookies to facilitate and improve your experience of Our Services and monitor errors and exceptions. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times. For more details, please refer section 14.4 below. These Cookies are not integral to the functioning of Our Services and your use and experience of Our Services will not be impaired by refusing consent to them.
- 9.2 All Cookies used by and on Our Services are used in accordance with current Cookie Law.
- 9.3 By accepting the terms of this Privacy Policy you give your consent to the placing of Cookies narrated, for the purposes specified in this Privacy Policy. You may, if you wish, deny consent to the placing of non-essential Cookies, this can be done by accessing the Cookies options in the settings; however certain features of Our Services may not function fully or as intended.
- 9.4 The following Cookies may be placed on your computer or device:

| Name of Cookie | Provider | Purpose/ Duration | Essential |
|--------------------|---------------------------|--|-----------|
| AADSSO | login.microsoftonline.com | Necessary for authentication session Duration: Session | YES |
| AADSSOTILES | login.microsoftonline.com | Keeps authentication session information Duration: 25 Months | YES |
| CCState | login.microsoftonline.com | Stores state data required for authentication Duration: 10 days | YES |
| ESTSAUTH | login.microsoftonline.com | Authentication session data Duration: Session | YES |
| ESTSAUTHLIGHT | login.microsoftonline.com | Lightweight authentication session data Duration: Session | YES |
| ESTSAUTHPERSISTENT | login.microsoftonline.com | Persistent authentication session data Duration: 3 Months | YES |

| | | | |
|--|---------------------------|---|-----|
| ESTSSSOTILES | login.microsoftonline.com | Keeps authentication session tiles information Duration: 25 Months | YES |
| MicrosoftApplicationsTelemetryDeviceId | login.microsoftonline.com | Device identification for telemetry Duration: 12 Months | YES |
| SignInStateCookie | login.microsoftonline.com | Tracks state data for sign-ii Duration: Browser session | YES |
| brcap | login.microsoftonline.com | Browser capabilities for improved experience Duration: 25 Months | YES |
| buid | login.microsoftonline.com | Identifies user session data Duration: 30 Days | YES |
| esctx | login.microsoftonline.com | Stores context data required for authentication Duration: Session | YES |
| fpc | login.microsoftonline.com | Tracks session and persistent state Duration: 30 Days | YES |
| stsservicecookie | login.microsoftonline.com | Stores state data required for session Duration: Session | YES |
| wlidperf | microsoftonline.com | Tracks performance metrics for authentication Duration: 25 Months | YES |
| x-ms-gateway-slice | login.microsoftonline.com | Gateway state for authentication Duration: Session | YES |

9.5 Our Services use analytics services provided by Google Analytics. Analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Services is/are used. This, in turn, enables Us to improve Our Services. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Services, it does enable Us to continually improve Our Services, making it a better and more useful experience for you.

9.6 The analytics service(s) used by Our Services use Cookies to gather the required information.

9.7 The analytics service(s) used by Our Services use the following Cookies:

| Name of Cookie | First / Third Party | Provider | Purpose |
|----------------|---------------------|------------------|--|
| _ga_* | First | thetraumaapp.com | Google analytics is used to anonymously track usage statistics, site performance, errors and exceptions for the purpose of improving site functionality and reliability. |

| | | | |
|-----|-------|------------------|--|
| _ga | First | thetraumaapp.com | Google analytics is used to anonymously track usage statistics, site performance, errors and exceptions for the purpose of improving site functionality and reliability. |
|-----|-------|------------------|--|

- 9.8 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 9.9 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Services more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

10. How do you Contact Us?

- 10.1 To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: hello@thetraumaapp.com

Postal Address: 4-8 Lady Lawson Street, Edinburgh, Scotland, EH3 9DS.

11. Changes to this Privacy Policy

- 11.1 We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.
- 11.2 Any changes will be immediately posted thetraumaapp.com/privacy If the changes materially affect the way in which We collect, process, retain or store your personal data, you will be required to accept these revised Terms. Any minor changes will be deemed to have been deemed to have been accepted on your first use of Our Services following the minor alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 27 June 2024.