

# Healthcare Invoice Finance Ltd Privacy Policy

## Introduction

This policy applies to your use of our website (the “Website”).

Healthcare Invoice Finance Ltd (collectively referred to as “HIF”, “we”, “us” or “our” in this privacy policy) respects your privacy and is committed to protecting your personal data. The purpose of this privacy policy is to inform you about how we look after your personal data when you visit our Website, and tell you about your privacy rights and how the law protects you.

## 1. Important information and who we are

### Purpose of this privacy policy

This privacy policy aims to give you information about how HIF collects and processes your personal data where HIF acts as a data controller in respect of your personal data. We act as a data controller when we determine how and why your personal data is processed (e.g. when you make contact with us via our Website).

In most circumstances where HIF processes your personal data, we do so as a data processor on behalf of Health International Billing Partners Limited (“HIBPL”). We act as funding and collection agent on behalf of HIBPL in relation to the payment and collection of funds for invoices for medical procedures carried out at HCA hospitals and in those circumstances, we act under the instructions of HIBPL. In those circumstances, HIBPL is the data controller in respect of your personal data. For more information about how HIBPL processes your personal data as a data controller, please see HIBPL’s privacy policy here. HIBPL is a separate company and is not part of our group.

Our Website is not intended for children (under the age of 13) and we do not knowingly collect personal data relating to children. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from children without verification of parental consent, where required, we may take steps to remove that information from our servers.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Healthcare Invoice Finance Ltd

Email address: [info@hifltd.co.uk](mailto:info@hifltd.co.uk)

Postal address: 20-22 Wenlock Road, London N1 7GU

You have the right to make a complaint at any time to the Information Commissioner's Office (“ICO”), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would,

however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. We will notify you of any changes by posting the new privacy policy on this page. You are advised to review this privacy policy periodically for any changes. This version was last updated in April 2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **2. The data we collect about you**

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer your name, your email address and your phone number.

We do not process any special categories of personal data as a controller (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel service you have with us but we will notify you if this is the case at the time.

## **3. How is your personal data collected?**

We use different methods to collect data from and about you including through direct interactions, where you fill in the form on our Website or email us.

## **4. How we use your personal data**

We will use your personal data to respond to you when you submit your contact details to our Website or contact us via email.

Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Contacting you where you have submitted your name and email address via the form on our Website	Name and email address	Necessary in our legitimate interests in order to effectively run our business.
Responding to queries submitted by email	Name and contact details including email address and phone number	Necessary in our legitimate interests in order to effectively run our business.
To manage our relationship with you which will include notifying you about changes to our privacy policy	Name and contact details including email address and phone number	Necessary for our legitimate interests in order to effectively run our business. To comply with a legal obligation.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### 5. Disclosures of your personal data

We may share your personal data with the following third party processors for the purposes set out in the table above:

- Service providers who provide IT and system administration services.

We may also share your personal data with third parties in the following circumstances:

- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy. HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any agreements; or to protect the rights,

property, or safety of others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

## **6. International transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see 'Your legal rights' below for further information.

## **9. Your legal rights**

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your personal data without having to exercise your legal rights. You can update our personal data yourself within your account settings section. If you are unable to do so, then please contact us to make the required changes.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

**Request access to your personal data** (commonly known as a "data subject access request") - this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction of the personal data that we hold about you** - this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data** - this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing of your personal data** - where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

**Request restriction of processing of your personal data** - this enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer of your personal data to you or to a third party** - we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** - where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the contact details above.

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.