Privacy Policy

Last updated: 14th, December 2021

1. Purpose of this Privacy Policy

This Privacy Policy describes the use of your personal information by King's College London, a registered charity in England and Wales (charity number 1136567) and a limited company ("KCL"), in connection with the use of PRECEDO-Stroke and Healthcare Professionals and healthcare professionals who treat stroke children with Ischemic Stroke/Transient Ischemic Attack ("PRECEDO").

Any references in this Privacy Policy to "we" or "our" are to King's College London, and "you" refers to respondents and users of PRECEDO-Stroke, healthcare professionals and professionals using PRECEDO, and the child patients in respect of whom you are responsible and who are the other users of healthcare professionals using PRECEDO-Stroke. "Personal information" means information collected in respect of the child whose data is collected, stored, analysed and used by KCL, healthcare professionals and caregivers, and by healthcare professionals using PRECEDO. "Personal information", means information that identifies, or could identify an individual.

Protecting your personal information is of utmost importance to us. We have tried to write this Privacy Policy carefully, as the information it contains affects your legal rights. Please read this Privacy Policy carefully. If you have questions about this Privacy Policy, you should read in conjunction with the PRECEDO-Stroke Terms of Use.

This Privacy Policy sets out:

1) What personal information we might collect about you;
2) How we might use that personal information;
3) What personal information we might share with others;
4) Your rights with respect to the personal information we process.

2. Overview of PRECEDO

PRECEDO is a digital health smartphone based application and web based clinician dashboard designed to help healthcare professionals and caregivers and healthcare professionals treating children with Ischemic Stroke/Transient Ischemic Attack (TIA). PRECEDO-Stroke is intended for use by Healthcare Professionals and Healthcare Regulatory Agency Users in the UK and EU. The child user of the app has PRECEDO-Stroke installed on their phone. Terms and Conditions of Service, which can be found at www.precedo.org, are provided to the child user and to caregivers when they first use the app.

Although PRECEDO collects, stores and processes data about children with PRECEDO, and therefore this PRECEDO Privacy Policy applies to the child's personal information, it is the clinician and/or caregiver who use the children's PRECEDO app.

PRECEDO was developed by the Child and Adolescent Mental Health Research Group at King's College London, in collaboration with researchers and clinicians from South London and Maudsley NHS Foundation Trust.

3. What information do we collect about you

We will collect, process and store personal information about you that is useful to us in carrying out our business.

(1) Information you have provided us with. This includes personal information about you that you for whom they are responsible provide us with, such as name, home address, date of birth, email address, telephone number, medical information and other personal information about you. PRECEDO-Stroke. For healthcare professionals, this information includes your name, work address and contact details. In other words, this may include personal information that identifies you or could identify you. The information is necessary for us to provide your experience with us. We only collect this information from you when you voluntarily provide it.

(2) Information automatically collected for you. This includes: a)Usage data collected automatically when you use PRECEDO-Stroke and other information that we may collect while using your data during the app. b)PRECEDO collects data about the number of times a patient completes a full number of days in which they make use of the PRECEDO app in order to improve adherence to treatment. PRECEDO also collects and processes personal data on the consultation.

We do not collect information including GPS location, web-browser history, and email or text messages on your smartphone.

(3) Information Provided from Other Sources. We gather information from Healthcare Providers and from the child user of the app. This information includes: Name, Date of Birth, Address, NHS Number, South London and Maudsley NHS Foundation Trust Hospital Number, Gender, Ethnicity, Medical information and other personal data. Some or information they have gathered about you from other sources, such as your GP, your Healthcare Provider that is a member of the London and Maudsley NHS Foundation Trust. We may also collect, store and use the following "special categories" of personal information about you: race, ethnic origin, genetic information and biometric information, in relation to your child.

(4) Cookies. PRECEDO- does not use cookies. Cookies are small files that are placed on your computer, phone or other device and that allow us to know you entered and navigated the app and what information you accessed and used.

4. Store we use your personal information

How we use your personal information depends on the PRECEDO app you use. We use your data in KCL other for the following purposes:

The PRECEDO- smartphone based app is a service provided to healthcare professionals and caregivers who have responsibility for a child patient. The app is a medical device which caregiver and healthcare professionals use ADHD are dea subjects.

The PRECEDO-Stroke dashboard is intended to be used by healthcare professionals during consultations with patients who have TIA or Stroke. The healthcare professionals may use the app as a data subject.

We will only use the information we collect about you lawfully.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that the reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

In exceptional circumstances, we may use your personal information for the following purposes:

- to identify you;
- to communicate in response to your queries;
- to update you on any changes to our Privacy Policy or other terms connected with your PRECEDO;
- to ensure and improve the safety and security of our PRECEDO;
- to enable your healthcare provider to provide you healthcare services.

We do not use your information for the purpose of **legitimate interests** (GDPR Article 6(1)(f)) or for **vital interests** (GDPR Article 6(1)(d)) that are provided for in the UK law, namely, we do not use your information:

- to enable us to discuss our services (and any changes to them);
- to communicate in response to your queries and to provide customer support services;
- to deal with administrative matters such as payment, billing, and account management;
- to manage our business and services and enhance your customer experience;
- to monitor and analyse our PRECEDO in order to improve the quality, security and availability of products/ services offered to our customers;
- to conduct market research surveys;
- to perform analytics on our research and service quality and delivery.

We will use and rely on your **consent** (GDPR Article 6(1)(a)) for the following purposes:

- to send you newsletters and campaign offers and to provide you with information about our campaign offers directly to the child/ caregiver, healthcare professionals and healthcare providers;
- to process your personal information using third party analytics and tracking technologies (cookies and similar) that are not currently used by PRECEDO;
- to use, in the future, information on our website regarding your medical condition, medical and consumer behaviour, healthcare and other interests, in order to provide you with more relevant and appropriate marketing and other communications, and to measure and improve the effectiveness of our marketing;
- for purposes other than for which the specific consent was given by you, provided that such purposes are compatible with the initial purpose.

We may process your personal information without your knowledge or consent where this is required or permitted by law.

5. Services to Healthcare Providers

We use your personal information through our Website on the following purposes:

(1) We will use your information for the purpose of performance of our contract (GDPR Article 6(1)(b)). For example, we may use your information:

- to conduct scientific research into ADHD;
- to perform evaluations of our research and service quality and delivery.

(2) We will use your information for the purpose of our legitimate interests (GDPR Article 6(1)(f)). For example, we may use your information:

- in connection with an actual or proposed sale or merger of our business, in order to establish, exercise or defend our legal rights;
- to prevent fraud or other activity that may be illegal or unlawful or for purposes, or in contemplation of such matters.

Where we have relied on our legitimate interests as a lawful ground for processing your personal information, we will carry out a balancing test in relation to our assessment of the impact on you.

(3) We will use and rely on your **consent** (GDPR Article 6(1)(a) Article 9 (2)(a)) when we process your data for the following purposes:

- to send you newsletters and campaign offers;
- to conduct psychometric research into satisfaction;
- to use and process your personal information using third party analytics and tracking technologies (please note that cookies are not currently used by PRECEDO);
- to use any language spoken by you and/or app for the purposes of feedback, research and improvement of our PRECEDO and related services. Please note that where possible, such images would be processed without identifying your personal information or particular characteristics or attributes;
- for purposes other than for which the specific consent was given by you, provided that such purposes are compatible with the initial purpose.

7. Who else can access your personal information?

In certain circumstances, we share your personal information with third parties who provide services to us, such as information security and business process IT services. We work with third parties who provide us with IT and telecommunications services and demonstrate our high standards and organizational security measures are sufficient to protect your personal information. Our authorised processors of IT services are currently Amazon Web Services, who are also subject to contractual obligations to keep your personal information secure and to use it only for the purposes for which we require the third parties to act on our instructions or for their own business purposes.

We may need to disclose your personal information to a government body or agency or to a law enforcement agency or third party if we are required to do so by law, or in response to valid requests by public authorities. We might also need to share your personal information with our professional advisers or with our IT service providers, if they are other lawful bases for it. If we need to make such a disclosure, we will use our best efforts to notify you of the disclosure unless we believe your personal information where possible.

We share personal information with depends on the services that we are offering.

8. Services delivered to responsible adult caregivers

We share your personal information with our healthcare professional partners because the reasons specified:

(1) with your Healthcare Provider in order to fulfill the healthcare services that they are providing to you. We share your data with them for the purpose of a relevant healthcare service;

(2) for provision of IT related services, including information security and business process IT services provided by our third party hosting provider and the cloud.

9. Healthcare Professionals Providers

We may also share your personal information with our healthcare partners because of the reasons specified:

(1) for provision of IT related services, including information security and business process IT software development, both local/national and the cloud.

10. Links to third party apps and websites

PRECEDO app may contain links to other apps and websites. These sites have been carefully selected by us and we will use our best endeavours to make sure that they do not contain anything that could be considered offensive or illegal. We do not control the content or practices of these other apps or websites and we cannot be responsible for their compliance with laws or regulations or for the content, policies, or practices of any third parties sites or services. We do not share your personal information with these third parties. We do not endorse or make any representations about them.

11. Anonymisation

We may consider anonymise personal information gathered and continue to use any information in a form that cannot reasonably identify or relate the user of PRECEDO-Stroke. We may use such anonymised information for any anonymising personal information, we follow the UK Information Commissioner's Office's anonymisation code of practice.

12. Data retention

Where your personal data relates to PRECEDO-Stroke, we will retain your data for as long as needed in the relevant medical research project. For other personal information, we will balance our need to keep your information with our legitimate interest and our records retention policy.

13. Children

PRECEDO is not targeted towards children under the age of 13. PRECEDO-Stroke is intended for use by healthcare professionals and caregivers to healthcare professionals, we collect information about children with caregivers consent. We follow the UK Information Commissioner's Office's Age Appropriate Design Code when processing data of children in respect of PRECEDO-Stroke. We do not consider that PRECEDO-Stroke is directed at children. We do not knowingly collect personal information from children, or other users who are not healthcare professionals, we collect information about children with caregivers consent. We do not offer any forms of marketing, or for any form of commercial communication, to children.

14. Your rights

You have the following rights regarding your personal information:

(1) Right to information: You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information. For more information, please see the information we share with you in this Privacy Policy.

(2) Right of access: You have the right to obtain access to your personal information (if we are processing it), and certain other information (similar to that provided in this Privacy Policy).

(3) Right to rectification: You have the right to correct your personal information if it is inaccurate or incomplete.

(4) Right to erasure: In certain circumstances you have the right to request that personal information held about you be erased.

(5) Right to restrict processing: You have the right to request that we restrict the processing of your personal information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be "blocked" to make sure the restriction is respected in future.

(6) Right to object to processing: You have the right to object to processing of your personal information in certain circumstances. For example, you have the right to object to the processing of your personal information for direct marketing purposes.

(7) Right to object to and not be subject to automated individual decision making: Subject to some limited exceptions, you also have the right to object to automated decision-making (including profiling) and not to be subject to decision based solely on automated processing that produces legal effects concerning you or other significant effects on you. Such processing is not automated decision-making if it is subject to human review.

(8) Right to data portability: You have the right to obtain and reuse your personal information in a structured, commonly used and machine readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred to others.

(9) Right to withdraw consent: If you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific purpose. It will not be lawful to use your information for the purpose you have withdrawn your consent for, unless we can rely on another legal basis to do so, or it does not mean that anything we have done in reliance on your consent in the past is not lawful.

(10) Right to complain: If you have any concerns about how we use your personal information, you have the right to make a complaint to the PRECEDO does not currently make automated decisions about children.

15. Contact information

If you have any questions or comments in relation to our approach to data protection and this Privacy Policy or about how we handle your information, please contact us:

Email: info@precedo.org

Phone: +44(0)20 7848 0974

Post: Data Protection Officer, Department of Business Assurance, King's College London, Waterloo Bridge Wing, Franklin-Wilkins Building, Stamford Street, London, SE1 9NH

16. Right to Complain to the Information Commissioner or other relevant supervisory authority

If you have any concerns about how we process your data or use of your personal information, we ask you to contact us first. We hope we can deal with any concerns you have. However, you have the right to lodge a complaint with the Information Commissioner's Office in the United Kingdom or with the supervisory authority in the EU, if applicable. Details are at https://ico.org.uk/make-a-complaint/.

17. Changes to this Privacy Policy

From time to time we may update this Privacy Policy. We will notify you of any changes to this Privacy Policy by posting the new Privacy Policy on our Website and/or on the PRECEDO app. We will also notify you of changes to this Privacy Policy by email or other means.

Copyright, King's College London, Registered Charity in England and Wales No 1136567, 2021