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**PRIVACY POLICY**

This privacy notice tells you what to expect us to do with your personal information. Your privacy is very important to us – please do not hesitate to get in touch if you have any questions.

- **Our contact details**

Bob Muir	
Designation	Director, patient and clinic liaison
Email address	<a href="mailto:bob@lifeonice.co.uk">bob@lifeonice.co.uk</a>
Telephone	+447426433237
Address	Muirden, 1 Drummond Street Dundee DD3 6LL

- **Data Protection Officer**

Josh Muir	
Designation	Systems and data protection officer
Email address	<a href="mailto:josh@lifeonice.co.uk">josh@lifeonice.co.uk</a>
Address	Muirden, as above

**1. Definitions**

We, us, our Life on Ice Ltd.

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You                    You, the patient with whom we have a contract to transport your samples.  
Clinic(s)                The centres (licensed by the HFEA or overseas equivalent) to which or from which we are transporting your samples.

**2.        What information we collect, use, and why**

We collect or use the following information to provide our services to you:

- Names and contact details
- Date of birth
- Website user information (including user journeys and cookie tracking)

**3.        Lawful bases**

We collect and use your personal information to fulfil our obligations to you as part of our contract, to fulfil our agreements with clinics as part of their obligations to the HFEA and for our legitimate purposes.

We maintain a copy of your name and contact details to provide our service to you, and so that we can refer to any previous work we may have done for you when you make future requests.

We may also store basic identifying information for requests made to our website. This includes metadata including URL, IP address, host information and the time the request was made. We store this information for security and logging purposes as part of our legitimate interests, but it is not connected or linked to your other personal data or transport requests.

**4.        Where we get personal information from**

We collect personal information directly from you as part of our transport process, and automatically collect basic website usage information.

**5.        How long we keep information**

We keep a copy of your name and contact details for a maximum of five years. After that time has elapsed, we will anonymise our records but may continue to store information about the services we provided, such as the nature of the transport, originating and destination clinics and the date the transport was performed.

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**6. Who we share information with**

**1. Data processors**

Google Inc

Google provides our office and email infrastructure, where all patient communication and data is held. We also use Google for our marketing and advertising campaigns and include a tag on our website for analytics purposes – they will process your data directly to assess the performance of our advertising campaigns and to provide us with general statistics on website use.

**2. Other organisations**

Health care providers –

The specific clinics between which you have instructed us to carry out a transfer of gametes and / or embryos. We will share your name and date of birth with the originating and destination clinic. This is essential to identify you as a patient with both clinics.

**7. Sharing information outside the UK**

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place. This will only be applicable for international transfers where you have specifically requested that we contact a clinic.

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place. Please contact us for more information.

**8. Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal data.

**Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.

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**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

**Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## 9. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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