

Privacy Policy

Effective Date 1st May 2023

Introduction

This privacy policy sets out the Flu Xpress Ltd (FX) protocol regarding collection, use, disclosure and storage of personal information (as defined below) that may be provided to FX either directly or via the FX website.

This policy should be read in its entirety before information is submitted to FX either directly or via the FX website.

FX reviews this privacy policy regularly and reserves the right to make changes at any time to take account of changes in its business and legal requirements. The “effective” date above indicates when the policy was last reviewed.

Personal Information

Information collected by FX may include names, business addresses, e-mail addresses and telephone numbers. Some of the information collected by FX may relate to an identifiable person, e.g the contact person in an organisation who requests a quotation for a workplace vaccination service from FX (hereafter called personal information).

Processing of Personal Information

FX will take all necessary steps to ensure that all personal information held by FX is processed fairly and lawfully. FX will take all necessary steps to implement and maintain this privacy policy. All FX employees, sub-contractors and data processors that have access to personal information are contractually obliged to respect the confidentiality of all personal information collected.

Collection of Personal Information and purpose thereof

FX collects and stores information about every organisation (including personal information that may relate to an identifiable person as specified above), that requests a quote or books a vaccination service to enable efficient provision of the requested service. FX uses information about its clients and their workplace service requirements and activity to provide or enhance the service(s) available to clients; to communicate with clients about additional services which may be of value or interest; to satisfy FX legitimate business interests; to accomplish legitimate corporate billing, accounting, and HMRC functions; and to comply with all published Government regulations applicable to FX.

Any personal information that FX collects will be used solely for the purpose of providing the services and of communicating with clients about additional services which may be of value or interest, and it will not be stored for any longer period than is legally permissible and required for this purpose.

Any email communication sent by FX to notify and inform clients about new or additional services will include an option to unsubscribe from future email communications sent for that purpose.

As a private medical services provider, FX is further legally required to create and retain a confidential medical record for any individual that receives a workplace health intervention. Personal information and all additional data contained in the medical record are subject to additional and enhanced safeguarding under the terms of The Private and Voluntary Health Care (England) Regulations 2001, Schedule 3.

Third parties

FX collects and uses information about clients and may contract with vendors (sub-contractors) to assist in processing that information for those purposes listed in the previous paragraph. In addition, FX may ask sub-contractors to process information, for those purposes, on its behalf.

FX sub-contractors are contractually required to maintain the confidentiality of the information and are restricted from using the information for any other purpose. FX monitors on an ongoing basis compliance with the provisions of the applicable legislation and regulations by third party processors, such as suppliers and sub-contractors, of personal information held by FX.

Access, correction and “right to be forgotten”

Clients of FX can ask what personal information is held by contacting FX in writing (including email). FX will acknowledge and comply with any such request within one month. Should FX be prevented from disclosing personal information it will advise the reason(s) for any such refusal. To keep personal information accurate, current, and complete, clients should inform FX about any incorrect information and FX undertake to update or correct personal information in its possession whensoever informed. FX both acknowledges and respects the “right to be forgotten” and will comply

with any written (including email) request for deletion of personal information within the provisions of all published Government regulations applicable to FX.

Data Subject access requests

FX has processes in place to ensure that it can facilitate any request made by an individual to exercise their rights under data protection law.

All individuals who are the subject of personal data held by FX are entitled to:

- Ask what information FX holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the FX is meeting its data protection obligations.

Cookies

A cookie is a small file which asks permission to be placed on the users computer's hard drive. Once the user agrees, the file is added and the cookie helps analyse web traffic or lets the user know when the user visits a particular site. Cookies allow web applications to respond to the user as an individual. The web application can tailor its operations to the users needs, likes and dislikes by gathering and remembering information about the users preferences. FX uses traffic log cookies to identify which pages are being used. This helps FX analyse data about web page traffic and improve the website in order to tailor it to client needs. FX only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help FX provide users with a better website, by enabling FX to monitor which pages users find useful and those of less interest. A cookie in no way gives or allows FX access to any users computer or any information about visitors to the website, other than the data a user chooses to share with FX.

Users can choose to accept or decline cookies. Most web browsers automatically accept cookies, but a user can usually modify browser settings to decline cookies if preferred. This may prevent some functionality of the website and alter the user experience.

Security

FX takes all steps reasonably possible to protect personal information as collected by FX either directly or via its website and to protect such personal information from loss, misuse, and unauthorised access, disclosure, alteration, or destruction. It should be borne in mind that internet transmission is not 100% secure or error-free. In particular, e-mail sent to or from any website may not be secure, and clients should take special care in deciding what information is sent to FX via e-mail.

Links to other websites

The FX website may contain links or references to other websites as a convenience to the user.

Clients should be aware that FX is not responsible for the privacy practices or the content of such other websites and this Privacy Policy does not apply to those websites. FX recommends that clients read the specific privacy policy of each web site visited.

It should be noted that internet transmission can never be completely secure, error or risk free. In particular, email sent to or from any website and/or to or from any individual email account may not be secure. Clients are encouraged to take special care when deciding what information is sent to FX via either email or the website, are reminded that computer viruses may be transmitted or downloaded via any email or internet communication either way, and that FX clients have a shared responsibility to take any local action necessary to prevent computer viruses being transmitted in this way.

Responsibility for the processing of personal data

If you have any concerns or wish to exercise any of your rights under the GDPR, then you can contact the Data Protection Officer;

Data Protection Officer
Flu Xpress Ltd
St Stephens House, Arthur Road, Windsor, Berkshire, SL4 1RU
Email: compliance@flu-xpress.co.uk
Telephone: 01753 911 287

How to complain

If you have any concerns or wish to make a complaint, you can make a complaint to the Data Protection Officer.

Data Protection Officer
Flu Xpress Ltd
St Stephens House, Arthur Road, Windsor, Berkshire, SL4 1RU
Email: compliance@flu-xpress.co.uk
Telephone: 01753 911 287

You can also complain to the ICO if you are unhappy with how FX have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>