Customer/user data protection and security is very important to us. This Privacy Policy lets you know what happens to any personal data that you provide to us, or any that we may collect from you.

This policy applies only to personal information processed by or on behalf of MASTA. Where our website contains links to other sites, we have no influence on whether they comply with the data protection regulations. You should check their own privacy policies before providing them with personal information.

We may collect information from you when you visit our website, apply for a service, contact us by telephone or email or receive a communication from us relating to your service. If you are a business customer, this policy applies to the information you provide to us about individuals within your business (for example directors), or information about you as a sole trader or partnership.

Use the links below to find out more about how we use your personal information:

- About us and how to contact us
- Cookies Policy
- What personal information do we collect, and how?
- Who do we share personal information with?
- Controlling your personal information

Changes to this Policy

We may change this policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We will update the date at the top of this policy accordingly. We encourage you to check this policy for changes when you revisit the website.

About us and how to contact us

We are MASTA Limited. You can contact us at enquiries@masta.org. Our address is:

MASTA Limited
7th Floor City Exchange
11 Albion Street
Leeds
LS1 5ES

If you have a specific question about our policy or how we use your personal information, you should contact “Privacy Policy Enquiries” at the above address or email address.

We have appointed a data protection officer to ensure that we process your personal information appropriately. You can contact them at paula.bennett@celesio.co.uk

Cookies Policy

We may collect information about your computer including your IP address, operating system and browser type, for the purposes of system administration. This is statistical data about our users’ browsing actions and does not identify any individual.

In order to collect this information and details about your general internet usage pertaining to the MASTA website, we will use cookies. A cookie is a small file of letters and numbers that is sent to your browser and stored on the hard drive of your computer (or internet enabled device) when you visit a website. They help us to improve our site and to deliver a better and more personalised service. We use cookies to:

- estimate our audience size and usage pattern
- store information about your preferences which allows us to customise our site according to your interests
- speed up searches
- recognise you when you return to our website

We only use session cookies on our website. We use one session cookie per visitor who is logged in.

The session cookie will track your activity on our website, including, your chosen itinerary information and the options you choose during the booking process. No payment details are stored.

You can use your browser options to decline our session cookies, but unfortunately in that case you will be unable to use the website’s functionality.

What personal information do we collect, and how?

If you make an enquiry or an appointment via this website, on the telephone or via email, or via any third party (including a pharmacy or a supermarket pharmacy concession), we will collect the information you provide to us, together with any information provided by that third party. We may monitor and record telephone and written correspondence with you to train our staff and monitor our services.

When you attend an appointment, we will collect further information from you, which will be processed in accordance with this policy, and, to the extent the information includes information about your health, such data shall be processed as is necessary for the purposes of health or social care.
We may use your information in the following ways:

<table>
<thead>
<tr>
<th>Personal information</th>
<th>Basis for processing</th>
<th>Purposes of processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>name, contact details, financial details, medical history, previous vaccination details</td>
<td>It is necessary for the performance of our contract with you, or to take steps for entering into our contract with you.</td>
<td>To help us identify you. To provide you with the vaccinations or treatments you have requested. To process your payment. To contact you with appointment reminders, and to suggest follow-up appointments. To contact you regarding our services including market research and other surveys.</td>
</tr>
<tr>
<td>name, contact details, service usage details, including details of any vaccinations purchased or administered, details of contact with us, web usage statistics</td>
<td>It is necessary to achieve our legitimate interests. Our legitimate interests include managing our business and business processes, managing risk, increasing our service provision; improving and changing our services and processes and marketing to you.</td>
<td>To analyse your account history and improve our services. To help run (and contact you about improving the way we run) any accounts, services or products. To manage our risks and improve our business practices. To help train our staff. To market to you by post or telephone. To market to you by email or other electronic means. To create statistics, analyse customer information, create profiles and create marketing opportunities (including using information about what you buy from us and how you pay for it, for example, the vaccinations you have had and any further immunisations which may be required) and to feed into our quality improvement programme via audits. To provide anonymised sales statistics to our suppliers and manufacturers of vaccinations to help improve their services.</td>
</tr>
<tr>
<td>name, contact details, financial details, service usage details, including details of any vaccinations purchased or administered, details of contact with us</td>
<td>It is necessary for us to comply with a legal obligation or to protect the vital interests of you or another individual</td>
<td>In certain clinics, to provide information to your GP about vaccinations which you have been given. To make data available to our regulators and other supervisory bodies, including the Care Quality Commission, Healthcare Inspectorate Wales, National Travel Health Network and Centre and the Regulation and Quality Improvement Authority. To manage any batch or product recalls. To respect your rights under data protection or other legislation.</td>
</tr>
<tr>
<td>name, contact details, service usage details, including details of any vaccinations purchased or administered</td>
<td>You have given us your consent</td>
<td>To provide details of any blood tests or outcome reports to your employer or other organisation procuring our services on your behalf as part of an occupational health scheme. To market to you by email or other electronic means, including sending reminders of potential follow-up appointments.</td>
</tr>
</tbody>
</table>

The provision of your personal information is not a statutory requirement, however, all of the information marked (*) on our application forms or notified to you as being required when you speak to a customer services representative is required in order to enter into a contract to receive our services. This is because we are unable to provide and safely manage the service without this information.

We protect your interests by making it easy for you to control the way in which we use your information. For more information, see Controlling Your Personal Information.

We may also obtain information about your computer, including where available your IP address, operating system and browser type in accordance with our cookies policy above.

Unless you ask us not to, we may send you reminders when your current vaccine protection runs out or when you are due for further tests, vaccinations or examinations. If you do not wish to receive such reminders, please email us at enquiries@masta.org.

**Aggregated information**

We may convert your personal information into anonymous data and use it for research and analysis, and also provide it to our suppliers for research and analysis purposes. Anonymised aggregated personal information does not personally identify you.
Who do we share personal information with?

We may also share your information:

- with your GP following your appointment only if you are a patient at particular surgeries and receive vaccinations from us. We will tell you if this applies to your surgery
- with your employer if you have received vaccinations or other occupational health services as part of our occupational health offering, provided that your consent has been obtained before sharing results of any blood tests or outcome reports
- if we buy or sell any business assets, in which case we may disclose your information to the prospective buyer or seller of such business or assets. If this does occur, all information will be anonymous
- if MASTA Limited or substantially all of its assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets
- to make data available to our regulators and other supervisory bodies, including the Care Quality Commission, Healthcare Inspectorate Wales, National Travel Health Network and Centre and the Regulation and Quality Improvement Authority
- if we are under a duty to disclose or share personal information in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply and other agreements, or to protect the rights, property or safety of MASTA Limited, our customers, or others e.g. in the event of a product recall or manufacturer alerts. This includes exchanging information with other companies and organisations for the purposes of fraud protection or risk prevention. We will always ask for your consent before sharing information in this way

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal information, in order to comply with any legal regulations or good governance obligations, or in order to enforce or to protect our rights, property, or safety, or that of our customers or other persons with whom we have a business relationship.

Controlling your personal information

You may withdraw your consent to receiving marketing at any time by emailing enquiries@masta.org.

It is important to MASTA that you are in control of your own information. As a result, we offer the following controls:

1. You may request access to or copies of the personal information that we hold about you. If you would like to exercise this right, please contact us at enquiries@masta.org or the address above
2. If you believe that any information we have about you is incorrect or incomplete, please contact us at enquiries@masta.org as soon as possible. We will take steps to seek to correct or update any information if we are satisfied that the information we hold is inaccurate. You may request that we restrict our processing
3. You may request that your personal information be deleted, where it is no longer necessary for the purposes for which it is being processed and provided there is no other lawful basis for which we may continue to process such information
4. If we are processing your personal information to meet our legitimate interests (as set out above), you may object to the processing of your personal information by us. If we are unable to demonstrate our legitimate grounds for that processing, we will no longer process your personal information for those purposes
5. If you have objected to our processing as set out above
6. If we are processing your personal information automatically for the purposes of performing our contract with you, you may have the right to request that the personal information we hold about you be transferred to a third party data controller

You may also request that we restrict the processing of your data to that to which you have consented or for the establishment, exercise or defence of legal claims or the protection of the rights of another person, whilst we verify your data as set out in point 2 above; pending verification of our legitimate grounds as set out in point 4 above; or if the processing is unlawful or no longer necessary, but you wish us to retain your data for the purposes of establishing, exercising or defending legal claims.

Please contact us if you have any concern about how your personal information is processed at enquiries@masta.org and we will try to resolve your concerns. However, if you consider that we are in breach of our obligations under data protection laws, you may lodge a complaint with the Information Commissioner's Office.

Retention of Personal Information

If you are a customer, we will retain your personal information for as long as is appropriate, bearing in mind the treatment you have received, and in accordance with guidance produced by the NHS on records management.

If you are not a customer, we may retain your personal information for 8 years after you provide it to us.

In certain circumstances, we may be required to retain your personal information for longer, where such retention is required by law or record keeping requirements, including managing our relationship with you or defending any claims.