

Vhi_360 Health & Wellbeing – Data Protection Notice

What is the purpose of this notice?

Our promise to you is that ‘when you need us, we’re there’. In order to fulfil that promise, and to provide you with our products and services, we need to get to know you and what your needs are. This means that we collect certain information about you in the course of operating our business. This notice sets out details of the information that we collect, how we process it, to whom we disclose it, and your rights under data protection law in relation to our processing of your data. This notice applies to the following VHI Health and Wellbeing services, collectively referred to as “Services”

1. Digital & First Contact
3. Planned Care
4. Urgent Care
5. Corporate Services
6. Care @ Home (“Services”)

Who controls the use of your personal data?

Vhi Health and Wellbeing DAC, whose registered address is Vhi House, Lower Abbey Street, Dublin 1, is the company that provides all of the Vhi Health Services available to you. Vhi Health and Wellbeing DAC controls and is responsible for personal data that is collected in relation to our member Health & Wellbeing services. If you have any queries in relation to the processing of your personal data, we have appointed a data protection officer that you can contact at DPO@vhi360.ie.

What personal data is collected?

In order to provide our services to you we need to process certain personal data in relation to you, which includes:

- *Biographical data* – We collect the following biographical data: name, address, email address, phone numbers, date of birth, gender, employer, next of kin details, general practitioner name and address.
- *Health data* – We collect personal data from you in connection with the particular health services that we are providing to you. This information is collected directly from you via questionnaires that you fill in, or during the provision of our services to you. It will also include health related data that we derive from any tests that are undertaken (e.g. heart rate, blood pressure, blood tests, hearing tests etc.).
- *Payment data* – If you pay by credit or debit card for any of the services we will process your credit or debit card details in order to take payment from you. If you pay by cheque, we will process the details listed on the cheque in order to process payment.
- *Vhi membership* – If the service is being provided under your Vhi Healthcare plan, we will process details about your Vhi membership in order to ensure you are entitled to avail of the particular services that we are offering. We may also process your personal data in order to support a claim that you may make under your Vhi Healthcare plan in connection with the service.
- *Interactions with Vhi Healthcare customer services* – If you interact with the Vhi customer services department we will record details of those interactions (e.g. records of phone calls, email correspondence and hard copy correspondence). If you make a complaint we will process details in relation to that complaint.
- *Digital platforms* - When you interact with Vhi's digital platforms you will often provide personal data to Vhi, which you will be aware of when using the services. Vhi also automatically collects data about your use of its services, such as the IP address of the device you use to access the

service, the type of device you are using, and how you interact with the services. Further details are available in the cookies policy and/or the data protection notice that accompanies the relevant service.

Where does Vhi collect personal data from?

Most of the personal data that we collect about you will be gathered from you as part of the services that we offer. However, certain information may be provided by third parties on your behalf, including the following:

- Group members- Services are covered by your Vhi Healthcare plan and we will receive verification of your health insurance cover from Vhi Healthcare.
- Medical service providers - We will request a copy of your medical files from third party service providers, such as your GP or other primary care givers.
- Your employer - if a policy is taken out via the organisation that you work for, certain personal information required for the administration of that insurance policy may be provided to us by your employer. Also, your employer may refer you directly to our services such as our Employee Assistance Programme (EAP). This would only be provided with your consent.

Why do you process my personal data?

We process your personal data in order to provide you with our services and to assist us in the operation of our business. Under data protection law we are required to ensure that there is an appropriate legal basis for the processing of your personal data, and we are required to let you know what that legal basis is. We set out further details of our processing of your personal data below, together with the legal basis for that processing:

Data Collected	Purposes/activity	Legal basis for processing
First and last name, email address, Policy Number, contact number, DOB, bank account or other financial details, certain medical data.	Providing you with our services. Making/receiving payments to and from you.	<ul style="list-style-type: none"> • The processing is necessary to perform a contract with you. • The processing is necessary for medical diagnosis, management of health systems and services • Your consent.
First and last name, email address, Policy Number, contact number, DOB, certain medical data.	Processing claims - make a claim for payment from the Vhi company that provides the Vhi Healthcare plan on your behalf.	<ul style="list-style-type: none"> • The processing is necessary to perform a contract with you. • The processing is necessary for medical diagnosis, management of health systems and services

		<ul style="list-style-type: none"> Your consent.
First and last name, email address, Policy Number, certain medical data.	Reporting to regulators, audits, compliance controls, responding to queries/requests for information in relation to claims.	<ul style="list-style-type: none"> Required in compliance with a legal obligation. The processing is necessary for medical diagnosis, management of health systems and services Your consent.
Name, certain medical data.	Providing copies of medical data/results to your GP	<ul style="list-style-type: none"> The processing is necessary to perform a contract with you/provide you with our services. The processing is necessary for medical diagnosis, management of health systems and services. Your consent.
Name, certain medical data.	provide you or a third party with details of your treatment in connection with a personal injuries action.	<ul style="list-style-type: none"> The processing is necessary to perform a contract with you. Required in compliance with a legal obligation. The processing is necessary for medical diagnosis, management of health systems and services.
Name, certain medical data.	clinical and non-clinical auditing and quality control, processing your data to meet certain regulatory and legislative obligations. Your data will be anonymized in such circumstances.	<ul style="list-style-type: none"> Required in compliance with a legal obligation. The processing is necessary for medical diagnosis, management of

		<p>health systems and services.</p> <ul style="list-style-type: none"> Your consent.
Name, membership data, non-medical data.	process your personal data in connection with the general administration of our business, including the generation of reports that detail how the business is functioning.	The processing is necessary to support our legitimate interests in managing our business.
Email address.	To send you emails that you have opted-in to receive, or having contacted us by email or by other means;	The processing is necessary to support our legitimate interests in managing our business.
First and last name, Email address, telephone contact details, any ad hoc information you provide to us.	Direct marketing - to contact/respond to prospects regarding additional services and offers.	Your consent.
First and last name, email address, location, phone number, professional qualifications, CV, references.	To process job applications from candidates for employment within our organisation.	Your consent.
Telephone recordings.	Recordings of telephone calls with our representatives and call centres, used for maintaining a record of customer transactions we complete over the phone.	<ul style="list-style-type: none"> The processing is necessary to support our legitimate interests in managing our business. Your consent.
CCTV recordings.	We use CCTV on our premises to ensure the safety and security of our patients and staff.	<ul style="list-style-type: none"> The processing is necessary to support our legitimate interests in managing our business. Required in compliance with a legal obligation.
Name, email, contact number.	To contact you regarding customer satisfaction surveys or questionnaires which we may ask you to complete.	The processing is necessary to support our legitimate interests in managing our business.

IP address, browser type etc.	To assist the proper operation and functionality of our website.	The processing is necessary to support our legitimate interests in managing our business and maintaining website security.
First and last name, email address.	To notify you about changes to our Data Privacy Notice.	The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to study how website users use our services).

Important information about when we ask for your consent to the processing of your personal data

In order to process personal data in relation to you, especially health data, we may need to get your consent in certain circumstances. When we process your personal data on the basis of your consent, you are free to withdraw that consent at any time. You can withdraw your consent by contacting us using the contact details at the bottom of this notice.

Information you are obliged to provide

We require certain information from you in order to be able to enter into a contract with you and to provide you with our services. Where this is the case we will indicate on relevant forms what personal data is required in order to enter into the contract with you. If you do not provide the information, we will not be able to provide you with our services.

Recipients of your personal data

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

- *Group companies* – Vhi consists of a number of separate companies. Some of these companies provide you with health and medical services. Some companies in our group also provide services on an intra-group basis, which may involve the sharing of your personal data between one or more group companies.
- *Medical service providers* – We may share personal data in relation to you with third parties that provide medical related services to us (e.g. labs that provide blood tests).
- *Your GP* – Depending on the type of services received by you, we may be required under best medical practice guidance to send your GP a copy of the relevant results, and if serious issues are identified we may contact your GP or consultant directly in relation to the results.
- *Service providers* – We rely on trusted third parties to help us run the Vhi business and to provide us with specialised services. This can include companies that provide IT services, from scanning letters that we receive and loading them onto our systems to hosting data on our behalf when providing software services. We also engage with companies that provide us with non-IT related services, such as payment service providers, legal advisors, accountants and consultants. Where our service providers have access to your personal data, we ensure that they are subject to appropriate contracts and other safeguards.

- *Other Parties When Required by Law or as Necessary to Protect Our Services* - For example, it may be necessary by law, legal process, or court order from governmental authorities to disclose your information. They may also seek your information from us for the purposes of law enforcement, national security, anti-terrorism, or other issues that are related to public security. We will challenge any such requests that are not valid.
- *Regulators* - In certain circumstances Vhi is obliged to provide information to a regulator, such as in relation to the investigation of complaints.
- *Your Employer* - in certain circumstances VHI will share your name with your employer if they co-pay for any of the services you avail of. This can include screening services and also if you request additional services under the Employee Assistance Programme (EAP)

Transfers outside of the EU

There are certain circumstances where we will transfer your personal data outside of the European Union to a country which is not recognised by the European Commission as providing an equivalent level of protection for personal data as is provided for in the European Union. If we transfer your personal data outside of the European Union please rest assured that we will ensure that appropriate measures are in place to protect your personal data and to comply with our obligations under applicable data protection law. This may mean that for example we use the new Standard Contractual Clauses approved by the European Commission or use such other GDPR compliant transfer mechanisms that may be approved from time to time. If you would like further details about the measures we have taken in relation to the transfer of your personal data, or copies of the agreements that we have put in place in relation to the transfers, please contact us using the details at the bottom of this notice.

Retention of personal data

Vhi will retain your personal data in accordance with our record retention policy. The record retention policy operates on the principle that we keep personal data for no longer than is necessary for the purpose for which we collected it, and in accordance with any requirements that are imposed on us by law. This means that the retention period for your personal data will vary depending on the type of personal data. For further information about the criteria that we apply to determine retention periods please see below:

- *Statutory and regulatory obligations* - As we work in a highly regulated industry, we have certain statutory and regulatory obligations to retain personal data for set periods of time.
- *Managing legal claims* - When we assess how long we keep personal data we take into account whether that data may be required in order to defend any legal claims which may be made. If such data is required, we may keep it until the statute of limitations runs out in relation to the type of claim that can be made (which varies from 2 to 12 years).
- *Business requirements* - As we only collect personal data for defined purposes, we assess how long we need to keep personal data for in order to meet our reasonable business purposes.

Your rights

You have various rights under data protection law, subject to certain exemptions, in connection with our processing of your personal data:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details set out below.
- The right to access the personal data we hold about you.

- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in contact details set out below.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- the right to lodge a complaint with the Data Protection Commission, if you have any cause for complaint about our use of your personal data. We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first.

In order to exercise any of the above rights, please contact us using the contact details set out below.

Questions and Complaints

If you have any queries or complaints in connection with our processing of your personal data, you can get in touch with us using the following contact details:

- Post: Data Protection Officer, Vhi, Vhi House, 20 Lower Abbey Street, Dublin 1
- E-Mail: DPO@vhi360.ie

You also have the right to lodge a complaint with the Data Protection Commission (DPC) if you are unhappy with our processing of your personal data. Details of how to lodge a complaint can be found on the dataprotection.ie website by selecting the appropriate webform, or by writing to the DPC at - Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2. DO2, RD28, Ireland.

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