

**PUBLIC**  
**Vitalscan**  
**External Privacy Notice**

## Document Control

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### Document Release:

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# Vitalscan

## External Privacy Notice

Last Updated: June 2026

### 1. Who we are and what we do

#### Who we are

We are Vitalscan (“Vitalscan”, “us”, “we”, “our”). We are a limited company registered in England and Wales under registration number 13852823, and we have our registered office at 100 Avebury Boulevard, Milton Keynes, Buckinghamshire, MK9 1FH. We are registered with the UK supervisory authority, Information Commissioner’s Office (“ICO”)], in relation to our processing of Personal Data under registration reference ZB307658.

#### What we do

We are in the business of providing private diagnostic healthcare services, including MRI and ultrasound imaging, blood testing, health screening, and related diagnostic assessments for patients and healthcare professionals. We are committed to protecting the privacy and security of the Personal Data we process about you.

#### Controller

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

### 2. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions or you wish to make a complaint, you can contact us using the information provided below under the ‘How to contact us and our Data Protection Officer’ section.

### 3. Who this privacy notice applies to

This privacy notice applies to you if:

- You visit our website.
- You contact us with an enquiry about our services or appointments.
- You book, purchase, or receive any of our diagnostic or healthcare services.
- You provide information to us through our website, by email, telephone, or in person.
- You sign up to receive newsletters, updates, or marketing communications from us.
- You attend one of our clinics as a patient or prospective patient.

- You are acting on behalf of a patient, for example as a parent, guardian, carer, or authorised representative.

This Privacy Notice explains how we collect, use, store, share, and protect your personal information when you interact with Vitalscan.

#### **4. What Personal Data is**

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

#### **5. Personal Data we collect**

The type of Personal Data we collect about you will depend on our relationship with you. For the type of Personal Data we collect see the table below in the section entitled ‘Purposes, lawful bases and retention periods’.

#### **6. How we collect your Personal Data**

We collect most Personal Data directly from you through various interactions, including in person, by telephone, text message, email, and via our website. This may occur when you:

- Contact us by telephone, email, text message, online enquiry form, or in person.
- Visit or use our website.
- Book an appointment or purchase one of our services.
- Complete registration, medical history, consent, or other healthcare-related forms.
- Attend one of our clinics or diagnostic centres.

However, we may also collect your Personal Data from third parties such as:

- Your GP, consultant, or other healthcare professional who refers you to us.
- Hospitals, clinics, or other healthcare providers involved in your care.
- Insurance providers, where applicable.
- Family members, carers, or authorised representatives acting on your behalf.
- Diagnostic or laboratory partners who support us in providing clinical services.
- Payment processors and booking platforms used to manage appointments and transactions.

#### **7. Purposes, lawful bases and retention periods**

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

<b>Categories of individuals</b>	<b>Categories of Personal Data</b>	<b>Purpose of Processing</b>	<b>Lawful Basis</b>	<b>Retention Period</b>
Patients Health Data	Name, address, email address, Medical history, scan and test results, referrals, appointment notes	To provide diagnostic healthcare services, manage appointments, maintain medical records, communicate results, and comply with legal and regulatory obligations	Contract; Article 9(2)(h) UK GDPR (health or social care purposes)	8 years after last treatment/contact (subject to applicable healthcare record retention requirements)
Patients Payment Data	Billing information, payment history, transaction details	To process payments, manage accounts, issue invoices, maintain financial records, and prevent fraud	Contract; Legal obligation	6 years from the end of the financial year in which the transaction occurred
Patients / Prospective Patients – Marketing Data	Name, email address, marketing preferences	[To send newsletters, service updates, health information, and promotional communications where permitted	Consent (electronic marketing); Legitimate interests (where applicable and lawful)	Until consent is withdrawn or the individual objects; suppression records retained as required
Enquirers / Prospective Patients	Name, contact details, enquiry details	To respond to enquiries, provide information about services, and arrange appointments	Legitimate interests; Steps prior to entering into a contract	Up to 2 years from last contact if no patient relationship is established

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Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

## 8. Sharing your Personal Data

We may share your Personal Data with our carefully selected third parties, including:

- We may share your Personal Data with carefully selected third parties where necessary for the purposes described in this Privacy Notice. These include:
- Diagnostic and clinical system providers, including platforms such as Meditce, Sectra, Medserve, and Medicia portals, which are used for storing, processing, viewing, and sharing diagnostic imaging, reports, and clinical information.
- Healthcare professionals and trusted referral partners, including GPs, consultants, and other healthcare providers, where a referral is clinically appropriate, required for your care, or requested by you.
- Payment service providers and financial institutions, used to process payments and help prevent fraud.
- IT service providers, cloud hosting providers, and software providers that support our website, patient management systems, and business operations.
- Professional advisers, including legal, accounting, audit, and insurance advisers.
- Regulators, courts, law enforcement agencies, and other public authorities, where we are required to disclose information by law, regulation, or legal process.

## 9. International Transfers

Your Personal Data may be processed outside of the UK. This is because the organisations we use to provide our service to you are based outside the UK.

We have taken appropriate steps to ensure that when your Personal Data is processed in a country outside the UK, it does not have a materially lower level of protection than that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or
- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here <https://ico.org.uk/media2/migrated/4019538/international-data-transfer-agreement.pdf>); or
- When transferring your Personal Data to America, we may rely on the UK-US Data Bridge, where appropriate.

## 10. Marketing Communications

With your consent, we may use your Personal Data to send you marketing communications by email about our services, offers, health screening packages, and other updates that we believe may be of interest to you.

You have the right to withdraw your consent and opt out of receiving marketing communications at any time. You can do this by clicking the unsubscribe link included in our emails or by contacting us at [care@vitalscan.health](mailto:care@vitalscan.health).

If you choose to opt out, we will stop sending you marketing communications. However, we may still contact you where necessary for essential service, administrative, or clinical purposes.

We do not sell your Personal Data or share it with third parties for their own marketing purposes.

## **11. Automated Decision-making**

We do not make any decisions about you based solely on automated decisions.

## **12. Your rights**

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**  
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)  
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**  
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)  
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**  
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**  
You have the right to restrict our use of your Personal Data. This means that you can ask us to suspend the processing of your Personal Data, in certain circumstances, such as where you contest the accuracy of your Personal Data.
- **Right to portability**

You have the right to ask us to transfer your Personal Data to another party.

- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

- **Right to withdraw consent**

If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

### **How to exercise your rights**

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

## **13. Complaints**

You have the right to complain if you consider that we have not complied with the data protection law when handling your Personal Data. We will acknowledge receipt of your complaint within 30 days, investigate the matter without undue delay, and keep you informed of the progress and outcome. If you wish to complain please use the contact details given below under "How to contact us and our Data Protection Officer". We will do our best to resolve the matter to your satisfaction.

If you are not satisfied with the outcome of your complaint, you can complain with the relevant supervisory authority. The supervisory authority in the UK is the Information Commission who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113

For supervisory authorities in other countries within the EU see the link below:

[https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## **14. Children's Privacy**

We do not offer our products and services to children and we do not knowingly collect Personal Data of children without parental consent, unless permitted by law. If you are a child, you must have your parent's permission to use our services. If you learn that a child has provided us with their Personal Data without parental consent, you may contact us, as described below, and if appropriate, we will securely and permanently delete it, in accordance with applicable law.

## **15. How to contact us and our Data Protection Officer**

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

**VITALSCAN LIMITED**

**100 Avebury Boulevard**

**Milton Keynes**

**England,**

**MK9 1FH**

care@vitalscan.health

We have also appointed a Data protection Officer ("DPO"). Our DPO Evalian Limited and can be contacted as follows:

**Evalian Limited**

**Unit 5**

**West Lodge Nobs Crook**

**Colden Common**

**Winchester**

**England**

**SO21 1TH**

[dpo@evalian.co.uk](mailto:dpo@evalian.co.uk)

Please mark your communications FAO the 'Data Protection Officer'.

## **16. Changes to this privacy notice**

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified 16<sup>th</sup> June 2026