



# Privacy Policy





## Celo Privacy Policy

This Privacy Policy is designed to help you understand everything you need to know about the what, why and how's of our data gathering and processing operations, and what your legal rights are.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and we will keep you informed if there are any changes to the way we process your personal data in the future, before making them.

Celo takes its responsibility of protecting your data very seriously and we do advise that you get to know our practices – If there's anything in this policy you don't understand or if you want to ask any questions, please feel free to contact us using any of the details below.

Celo supports the 7 Caldicott Principles, the 10 Data Security Standards, the General Data Protection Regulation (2016), the Data Protection Act (2018), the common law duty of confidentiality, the HIPAA Security Rule and Privacy Rule, HITECH Act, and all other relevant international legislation for the regions we operate in. We recognize data protection as a fundamental right and embrace the principles of data protection by design and by default. Please see our Data Protection Policy on our [legal](#) page for more information.

**Celo acts as a processor for User Generated Data (including patient data) on behalf of Celo Users and as a Controller of Celo User Data (the health providers that use our service).**

### Who Are We?

We are Celo, a healthcare messaging company. In this document, Celo will sometimes be referred to as "we".

Celo means all companies in the Celo group of companies including Celo Limited, Celo Health Pty Ltd and Celo Health, Inc. The contact details for these companies is listed at bottom of this document. You can contact us at any of the locations listed in this document.

Our representative in the EU for matters concerning data protection is Ametros Ltd.  
Our EU Representative can be contacted using any of the following details:

#### **Ametros Ltd**

Unit 3D  
North Point House  
North Point Business Park  
New Mallow Road  
Cork  
Ireland  
Email: [gdpr@ametrosgroup.com](mailto:gdpr@ametrosgroup.com)

Our representative in the UK for matters concerning data protection is Ametros Group Ltd.  
Our UK Representative can be contacted using any of the following details:

#### **Ametros Group**

Lakeside Offices  
Thorn Business Park  
Rotherwas, Hereford, HR2 6JT  
Telephone: UK: 03302232246  
Email: [dpo@celohealth.com](mailto:dpo@celohealth.com)

Outside of the UK and EU regions, you can contact Celo at the locations listed at the bottom of this document.



## What kind of personal data might we ask you to provide?

Celo will only ever ask for personal data if it is required for a specific purpose; with that in mind we have created a full list of all the kinds of personal data that we may ask you to provide in order to achieve those purposes. The kinds of personal data we may collect are outlined in the table below.

Data subjects:	Data categories:	Description
<b>Celo User Data</b>	Name, address, telephone, email, usernames, GMC or health profession registration number, proof of identification for validation (passport or driving licence)	This refers to personal data collected about our Celo users. Celo is a data controller of user data. Our Celo users are the data subjects.
<b>User Generated Data</b>	Message data, images, Patient ID, Date of Birth, Gender, Name, All other Health Information	This refers to all data collected by our Celo users while using the Celo platform. This data is largely sensitive patient information and personal information of the patients being discussed (data subjects). For clarity, Celo is a data processor of User Generated Data. Our Celo users are the controllers of User Generated Data.  Under HIPAA, Celo is a Business Associate who processes, stores or transmits Protected Health Information (PHI) on behalf of the Covered Entities (healthcare providers) who use our platform.

## Why do we collect personal data?

We will use personal data firstly to fulfill any contractual obligations that exist between us and yourself; where we request personal data be provided to meet the terms of any such contract you will be required to provide the relevant personal data or we will not be able to deliver the goods and/or services you want. In such cases, the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We may also process your personal data in accordance with our legitimate business interests; this is on the considered measure that we need the personal data to achieve the various purposes and that it could be reasonable for an individual to expect their data to be used for those purposes.

You may choose to opt-out of Celo using any of your user data. However, if you choose to do so, your experience of the Celo Platform may be sub-optimal.

Our data processing activities conducted on the lawful basis of 'legitimate interests' are:

1. To provide you with the goods and services you are using,
2. To improve the quality of the services we offer, and to better understand our customers' needs by requesting feedback, or requesting you review the services we have provided, or we may send survey forms that we ask you to complete,
3. To notify you of any changes to the goods and/or services we provide or have provided, that may affect you,



4. To allow us to understand the scale and range of our customer base; for statistical analysis and market research,
5. To recognize when customers re-engage with our services,
6. To allow us to support and maintain our products in active service,
7. Improve our website so content is delivered more efficiently,
8. To enhance the security measures in place that protect data we are responsible for,
9. To protect the company's assets.

We may also process your personal data in order for Celo to comply with our various legal obligations; this might include:

1. Providing for financial commitments between us and yourself, or to relevant financial authorities,
2. Complying with industry regulatory requirements and any self-regulatory schemes, Complying with industry regulatory requirements and any self-regulatory schemes,
3. Cooperating with relevant authorities for reporting criminal activity, or to detect and prevent fraud.

Under HIPAA, Celo is permitted to use or disclose Protected Health Information (PHI) for treatment, payment or healthcare operations, which includes quality assessment and improvement, business planning and general administrative activities, activities related to compliance with HIPAA and HITECH and other similar purposes described in 45 CFR § 164.502(a).described in 45 CFR § 164.502(a).

## Where did we obtain your personal data?

Other than collecting data directly from you;

We source personal data from some publicly accessible sources such as:

**Medical Registration data, Workplace websites (e.g NHS Trust Websites) and other professional healthcare registration bodies in the regions we operate.**

We may gather personal data from sources including:

1. Technical sources that gather data over time when you visit our online platforms,
2. From third party organisations, which can mean your personal data has been provided directly by another company for a specific purpose, or where you may have accessed our platforms through a third-party online service,
3. Local or national authorities provided for specific purposes.

If you would like more information about how Celo uses internet cookies please see our [Website Privacy Policy](#).

## Who might we share your information with?

We may share your personal data with the other members of our group of companies, which includes any subsidiary or the holding company (each as defined by the Companies Act 2006) of Celo.

In order to achieve the above-stated purposes for which we process your personal data, we may need to share your personal data with various third-party service providers who act as data processors.

We may share your personal data with third party organizations acting as data controllers or with specific individuals, groups or other organizations who act as neither data controllers nor data processors, but only where we are either legally required to do so by law or where doing so is necessary to achieve the intended stated purpose of processing the data.



In the event that we sell or reorganize our business, or if otherwise required by law or by an authorized regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

## Where is my data going to be stored?

Celo stores your personal data in line with our Celo Cloud Policy. You can find this document here:

<https://www.celohealth.com/legal/>

We may be required to transfer your personal data to organizations who intend to transfer the data outside the EU. Where such transfers of data take place, we shall ensure that contracts are in place between the parties involved that ensure the recipient organization has a suitable standard of data protection in place.

Celo as a part of its standard business practices may be required to transfer your personal data to countries outside the European Union (EU), or to organizations who intend to transfer the data outside the EU. Where such transfers of data take place, we shall ensure that appropriate control measures are in place (for example contracts are in place between the parties involved that ensure the recipient organization has a suitable standard of data protection in place).

## How long will we keep your data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was gathered, in line with this privacy notice. Please contact us for more information about our data retention schedule.

For determining when personal data should be erased we shall take into consideration the amount of and sensitivity of the personal data we have, the amount of harm that could be caused by a data breach, the benefits of the purposes the data is being used for and any legal requirements that we are bound to.

You may request that we erase your personal data at any time, though in cases where there is a remaining relevant or legal reason why we are required to keep the data we may opt to restrict the amount of processing being conducted to what is absolutely necessary in line with your legal rights in order to minimize the impact the processing will have.

## Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Celo, we take your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

### You have the Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using any of the details below.

### The Right to Erasure

This is your right to be forgotten. If, for any reason, you wish that we erase any personal data connected to you, you may request that we erase it. We will process these requests without undue delay.

### The Right to Rectification

This one is fairly straightforward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

### The Right to Restriction

This is your right to restrict how Celo processes your data. You may request that we limit the way we use your personal data. If you wish to restrict our use of your data, please contact us.



### **The Right to Objection**

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use or have used your personal data, you may do so freely. This includes your right to withdraw consent from Celo.

### **The Right to Portability**

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine-readable format, either to you or to another provider of your choosing.

### **The Right to Complain**

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organization. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters; if however, you would like to complain about Celo to a supervisory authority you may do so by contacting the Information Commissioners Office on United Kingdom number 0303 123 1113, or any of the other reporting methods listed on their website - <https://ico.org.uk/concerns>

## **Our Data Protection Officer**

### **EU**

Ametros Ltd  
Unit 3D  
North Point House  
North Point Business Park  
New Mallow Road  
Cork  
Ireland  
Email: [gdpr@ametrosgroup.com](mailto:gdpr@ametrosgroup.com)

### **UK**

Ametros Group  
Lakeside Offices  
Thorn Business Park  
Rotherwas, Hereford, HR2 6JT  
Telephone: UK: 03302232246  
Email: [dpo@celohealth.com](mailto:dpo@celohealth.com)

## **Our HIPAA Privacy Officer**

Steve Vlok, CEO and Privacy Officer  
Email: [privacy@celohealth.com](mailto:privacy@celohealth.com)

## **Our HIPAA Security Officer**

Wei Pan, Tech Lead and Security Officer  
Email: [security@celohealth.com](mailto:security@celohealth.com)

## **Our contact details**

If you wish to get in touch with Celo please do so by using any of the following contact details:

### **Celo New Zealand Head Office**

Celo Limited  
Level 1, 63 Ponsonby Road, Auckland,  
New Zealand, 1011

### **Celo United States of America**

Celo Health, Inc.  
2815 Elliott Ave Suite 100  
Seattle  
WA 98121  
United States

### **Celo United Kingdom**

Celo Limited  
Grosvenor Gardens 52, Grosvenor Gardens,  
Belgravia, London,  
United Kingdom, SW1W-0AU

### **Celo Australia**

Celo Health Pty Ltd  
3/45 Watt St, Newcastle, NSW,  
Australia, 2300

### **Contact details**

[support@celohealth.com](mailto:support@celohealth.com)

