



## Privacy Policy

This Privacy Notice sets out the basis upon which any personal data we collect from you, or that you provide, will be processed by us. Please read the following carefully to understand our views and practices relating to the processing of your personal data.

You should read this Privacy Notice if you visit our website <https://www.ariafertility.co.uk>

This Privacy Notice:

- provides you with a detailed overview of how we will manage your data, from the point at which it is collected and going forwards.
- will give you all the details you need on how we use your information, and how we will comply with the law in doing so. We may also, with your specific agreement, contact you with marketing materials.
- sets out your rights in respect of your personal information, and how to exercise them. You can, for instance, seek access to your medical information, object to us using your information in particular ways and request rectification of any information which is inaccurate.

### Our Contact Details

Name: Aria

Address: 8 Welbeck Way, London, W1G 9YL

Phone Number: 0203 263 6025

Email: [admin@ariafertility.co.uk](mailto:admin@ariafertility.co.uk)

Website: [www.ariafertility.co.uk](http://www.ariafertility.co.uk)

In this Privacy Notice we use "we" or "us" or "our" to refer to Aria who will be using your personal information, to provide our services to you. We are committed to protecting and respecting your privacy and intended to comply with the requirements of the current legal framework in relation to the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR) and the Data Protection Act 2018 (DPA 2018) on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data. For the purposes of Data Protection Legislation we are the data controller.

### Personal Data

Personal data is defined in the UK GDPR as:

*“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.*

In providing our services, we may process personal data and special categories of personal data about you.



We may collect, use, store and transfer the following types of personal data about you:

- **Identity details**, including your first name, last name, gender, date of birth;
- **Contact details**, including your address, email address and telephone number;
- **Emergency contact details**, including next of kin;
- **Financial details**, including bank account, payment or credit card information;
- **Technical details**, including IP address, geographical location, browser type and version, operating system, and other technology on the devices you use to access our Website;
- **Website usage details**, including referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your service use;
- **Marketing and communications details**, including your preferences in receiving marketing from us and your communications preferences.

We may also collect, use, store and transfer the following special categories of personal data about you:

- **Data concerning your health**, including details of your medical history, fertility treatment history, current treatments, medications, appointments, scans, and test results;
- **Data concerning your sex life or sexual orientation** but only when this information is relevant to the treatment you are receiving and in order to personalise our services;
- **Personal data revealing your nationality, race and/or ethnicity, or religious beliefs** but only when this information is relevant to the treatment you are receiving and in order to personalise the services.

## How Do We Collect Your Personal Data?

Most of the personal information we process is provided to us directly by you when:

- you complete a contact form on the website;
- you submit a query to us through by email or by social media;
- you complete registration forms;
- you receive treatment, diagnosis or screening services from Aria;
- you communicate with us by letter, email or telephone;
- you reference Aria in a review, feedback form or social media post.

We also receive personal information indirectly, from the following sources:

### **Referral from other healthcare organisations or service providers:**

Information may be shared with us directly from another healthcare organisation or service provider so we can provide specific services to you. This information may include:

- medical records from your GP;
- medical records from your clinician or healthcare professional;
- medical records from the NHS or a private healthcare organisation.

### **Communication with third party service providers:**

It is sometimes necessary that we communicate with other external organisations to collection information necessary to provide our services:

- we communicate with third party health professionals or other treatment providers;
- if the origin of your engagement with us is through a referral platform, we will communicate with the provider to collect personal data about yourself, so we can provide specific advice to you;



- we liaise with your current or former employer;
- we liaise with insurance companies or other healthcare benefit provider;
- we liaise with regulatory authorities such as the Human Fertilisation & Embryology Authority (HFEA), Care Quality Commission (CQC), the Home Office and HMRC;

## How Do We Use Your Personal Data?

Aria collects, processes and stores personal information for the purpose of providing its services. Each time we use your data we must have a lawful basis (or bases) to do so. For this reason, we will only use your personal data when the law allows us to.

Most commonly, we will use your personal data in the following circumstances:

- Where we are to provide our services in accordance with your requests, i.e our contract to provide the requested services to you. We rely on this information to support the diagnosis, screening, and medical treatment services we provide;
- When processing is necessary on the basis of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. We will rely on this for activities such as, maintaining accurate personal records, developing, and improving our services and monitoring outcomes;
- Where we need to comply with a legal or regulatory obligation. We are required by law to provide your personal information to our regulator, and in which case we will have a legal responsibility to do so;
- Where you have provided your consent to our use of your personal information and disclosure third parties as required;
- In the case of special categories of personal data, where you have provided your explicit consent.

Please note that where you have provided us with your consent to use your personal data, you can withdraw your consent to further use of your personal information at any time. Withdrawal of your consent will not impede on the lawfulness of the processing of your personal data conducted up to the date of the withdrawal.

You can withdraw your consent by contacting Aria whose details at the top of this policy. In relation to your use of our services, please be aware that the withdrawal of your consent will prevent us from providing any further services to you.

## Who Do We Share Your Personal Information With?

We may share and disclose your personal data with the following categories of third parties for the purposes described in this privacy policy:

- Yourself, upon your request & consent;
- Specifically authorised personnel of Aria, including doctors, nurses, scientists, carers, administrators or any other healthcare professionals involved in your treatment;
- Anyone that you ask us to communicate with or provide as an emergency contact, for example your next of kin;
- Pharmacists, health facilities, pathology laboratories and regulatory bodies, specifically authorised and abiding to medical confidentiality and health data sharing regulations;
- Homecare fertility medication providers;



- We may disclose your personal data to our service providers who assist with administration of your healthcare, such as insurance companies or external benefit providers
- If you originally engaged with us through a referral platform we will liaise with the provider to confirm dates of consultations or treatments so they can provide ongoing assistance and support;
- Our third party services providers such as IT suppliers, accountants, auditors, lawyers, marketing agencies and, document management providers;
- Regulatory and/or government bodies such as the Human Fertilisation & Embryology Authority (HFEA), Care Quality Commission (CQC), the Home Office and HMRC;
- We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure;
- Any scientific partners of Aria that would carry out studies, research, or evaluations, providing that your personal data will be pseudonymised.

Aria ensures that none of your personal data will be transferred to a non-authorized third party, without your consent.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### How Do We Store Your Personal Data?

All information that you provide to us is stored on secure servers. If you have been granted access to secure areas of the Aria website and you have a password to access restricted, personalised content on the website, whether the password is provided or you have chosen your own, you are responsible for the safe and confidential management of your password. It is important that you do not share your password with anyone.

Although we will do our best to protect your personal data, the transmission or information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our site, and any transmission is at your own risk. Once we are in receipt of your information; we will use security procedures and features to try and prevent unauthorised access.

### How Do We Protect Your Personal Data?

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## How Long Will Your Personal Data Be Kept?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with our legal and regulatory obligations

In case you decide to not use our services, your personal data will be kept for 1 year from the date that you tell us. Please note that the HFEA requires that patient/donor records, for full traceability, must be kept for a minimum of 30 years (or for such longer period as may be specified in Directions from the HFEA) after clinical use, or the expiry date, in an appropriate archive acceptable to the HFEA. Whereby we do not know that any child was born following the treatment, no information shall be removed from the records of the centre for which that person is responsible before the expiry of a period of 50 years after the information was first recorded.

For any other personal not covered by the HFEA guidelines, this will be kept during your contractual relationship with Aria and then will be archived for a period of 7 years before it is deleted.

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. For example, usage details will be retained for as long as necessary for the relevant processing purposes.

## International Transfers

We (or third parties acting on our behalf) may store or process information that we collect about you in countries outside of the United Kingdom. For example, some of the service providers we use for pathology testing send pathology samples to a lab in the US, and this would involve a transfer of your personal data to the US. Whenever we transfer your personal data outside the United Kingdom, we ensure that a similar degree of protection is afforded to it by ensuring appropriate safeguards are implemented, where necessary.

## CCTV Surveillance

Aria employs closed-circuit television (CCTV) cameras on our premises to enhance safety and security, protect against unauthorized access, and maintain a secure environment for all individuals present. This section of our privacy policy outlines the details of how we collect, process, and store data through our CCTV systems.

Our CCTV cameras capture visual data within the areas where they are deployed. This may include, but is not limited to, images of individuals and vehicle registration plates recorded within the camera's range.

We process CCTV data based on our legitimate interests in maintaining the safety and security of our premises, as well as to fulfil our legal obligations. We may also rely on consent when required by law or when visitors provide it voluntarily.

CCTV data is retained for a limited and reasonable period, typically in accordance with applicable legal requirements. Access to CCTV footage is restricted to authorized personnel, including our security team and law enforcement authorities, when required. CCTV data may be disclosed to law enforcement agencies and for legal, investigative, or security purposes.

We take appropriate technical and organisational measures to safeguard CCTV data against unauthorised access, disclosure, alteration, and destruction.



## Use of Artificial Intelligence (AI)

### Additional AI Transparency – Use of Heidi Scribe

As part of our clinical documentation processes, we use Heidi Scribe, a secure clinical transcription tool, to support real-time documentation of consultations and the preparation of clinical correspondence.

- Real-time transcription only: Heidi Scribe transcribes consultations in real time. No audio recordings are made, stored, or retained at any point.
- Secure storage: Transcripts are stored on a secure UK-based cloud server in compliance with UK data protection requirements.
- Anonymisation: Transcription data is anonymised where appropriate to protect your identity.
- Retention and deletion: Transcripts are retained in accordance with Aria's data retention policy and are securely deleted at the end of the applicable retention period. Once deleted, they are irretrievable.
- Human oversight: All transcribed content and any resulting clinical notes or correspondence are reviewed and approved by a qualified clinician before being added to your medical record or shared.

This use of Heidi Scribe supports accurate record-keeping, improves efficiency, and allows clinicians to focus more on patient care while maintaining strict confidentiality and data security standards.

### What Information Is Used

When Heidi is used, it may process information you share with us during your consultation, including details about your health. This is done only to:

- make sure your medical notes are accurate;
- support safe and continuous care; and
- prepare clear and timely letters and clinical documents.

### Why We Use AI Tools

We use AI tools like Heidi to help us provide high-quality care, keep accurate records, and reduce the time spent on administrative tasks. This allows our clinicians to focus more on you.

We use your information in line with data protection law, healthcare regulations, and our duties as a healthcare provider. Where consent is required, we will ask for it.

### Keeping Your Information Safe

We take protecting your information seriously. When using AI tools, we ensure that:

- your data is kept secure and confidential;
- only authorised staff can access your information;
- AI-generated content is always reviewed by a human; and
- your data is not used to train public or third-party AI models.

AI is not used to make decisions about your care without human involvement.

If you have any questions about our use of AI, please contact us using the details at the start of this Privacy Policy.



## What Are Your Rights Concerning Your Personal Data?

Under data protection law you have certain rights in relation to the personal information that we hold about you. These include rights to know what information we hold about you and how it is used.

Under certain circumstances, by law you have the right to:

- Information relating to how we collect and process your personal data (Privacy Notice);
- Access your personal information;
- Rectify or correct any mistakes to your personal data;
- Erase your personal data, in certain situations;
- Apply restrictions on our processing of your personal data;
- Obtain an electronic copy of your personal data (right of portability);
- Object in certain other situations to our continued processing of your personal data;
- Object to decisions being taken by automated decision making including profiling, which means decision making solely by automated means without any human involvement;
- Withdraw your consent to our processing of your personal data, where we have collected and processed your personal data with your consent. Please note, however, that where you withdraw your consent this will limit our ability to provide our services to you;
- Make a complaint to your supervisory authority. In the UK, this is the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

You may exercise these rights at any time by contacting us using the details set out above at the top of this policy. We may need to request further information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within 20 working days. Occasionally it may take us longer than 20 working days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Updates To This Privacy Policy

In the event of an update of our privacy policy, we will publish information regarding the changes on our website.

If these changes result in any material difference to the manner in which we process your personal data these changes will be displayed on our website.

We kindly request that you regularly look at our privacy policy and check if any changes have been introduced.