#### **PRIVACY NOTICE**

#### What is the purpose of this document?

Imperial College of Science, Technology and Medicine (the "College" or "Imperial") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation the Data Protection Act 2018 and the General Data Protection Regulations (the "GDPR") and the College's <u>Data Protection Policy</u>.

The College is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This Notice applies to the online visitors of public-facing worldwide web-based directory of lipid clinics, now referred to herein as "FindMyLipidClinic.com". The purpose of FindMyLipidClinic.com is to freely provide a worldwide directory of lipid clinics to its online visitors.

This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time.

It is important that you read this Notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### Information protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept securely.

#### The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

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We shall collect your Internet Protocol (IP) address, your web browser version called an "user agent". This information will not be stored in a retrievable format but rather as a unique de-identified token that will allow us to count the number of unique visitors and get an insight on FindMyLipidClinic.com use and use this information for the development of the website.

We shall strictly not collect, store and use any "special categories" of more sensitive personal information about you whatsoever.

#### How is your personal information collected?

This personal information stated in the previous section will be collected automatically and transparently by FindMyLipidClinic.com. The collected information will subsequently be encrypted using a one-way encryption technique that does not permit the retrieval of the original personal information. Such method is now referred to herein as "hashing" (i.e. cryptographic hashing function) and is equivalent to pseudo-anonymisation.

We will keep your hashed personal information for as long as the website is in use. We will then dispose your information by deleting the database of hashes.

# How we will use information about you and the legal basis for processing your personal data under the GDPR

We shall not use nor store identifiable personal information, but we will store, and use the derived pseudo-anonymised hashes to count the number of unique visitors on FindMyLipidClinic.com. We shall collect your personal information with the removal of personal identifiers in the legitimate interest of having an insight on FindMyLipidClinic.com usage and to inform its development.

#### **Data security**

We have put in place measures to protect the security of your information.

We will use the latest hashing function called Secure Hash Algorithm 3 (SHA-3) that prevents decryption of the original information.

We have put in place appropriate security measures to prevent your hashed information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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

#### **Data Protection Officer**

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice, please contact the Information Protection Officer at:

Imperial College London
Information Protection Officer
Exhibition Road

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Faculty Building Level 4 London SW7 2AZ

e-mail: dpo@imperial.ac.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for information protection issues.

If you have any questions about how we handle your personal information, please contact us at:

EAS FHSC Coordinating Centre Imperial Centre for Cardiovascular Disease Prevention Department of Primary Care and Public Health Imperial College London Reynolds Building Level 3 London W6 8RP

e-mail: coordinator@eas-fhsc.org

## **Changes to this Privacy Notice**

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.