Privacy Notice

MedCurrent UK Ltd, and it's parent VitalHub Corp., together "MedCurrent", is a physician-founded clinical decision support (CDS) software company focused on improving the quality of care and managing health system costs. Our software enhances the clinical decision-making process with real-time, evidence-based guidelines integrated at the point of care to guide effective healthcare delivery.

As part of the services we offer, we are required to process personal data about our staff and our service users. "Processing" can mean collecting, recording, organising, storing, sharing or destroying data.

We are committed to being transparent about why we need your personal data and what we do with it. This information is set out in this privacy notice. It also explains your rights when it comes to your data.

If you have any concerns or questions, please contact us:

UK:

Name: MedCurrent UK Ltd. Attn: Privacy and Security Officer

Address: 5 SOUTH CHARLOTTE STREET, EDINBURGH, EH2 4AN, UNITED KINGDOM

Phone Number: +44 (0) 141 488 0915 x2

E-mail: compliance@vitalhub.com

International:

Name: VitalHub Corp. Attn: Privacy and Security Officer - MedCurrent

Address: 480 UNIVERSITY AVENUE, SUITE 1001, TORONTO, ONTARIO, M5G 1V2, CANADA

Phone Number: +1 (855) 279 3380 x2

E-mail: compliance@vitalhub.com

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What information do we collect about you?

Customers:

We collect information about you when you use the MedCurrent CDS software to request a diagnostic test and/or other clinical purposes. We also collect information when you voluntarily complete surveys or provide feedback. Because is often integrated into other systems, such as electronic patient or medical records (EPR or EMR), order comms, ordering portals, and radiology information systems (RIS), the information we collect about you often originates from and is housed in these systems as well. This includes but is not limited to:

- Patient Date of Birth (DOB) is **required** in order to obtain valid clinical recommendations
- Patient Sex is **required** in order to obtain valid clinical recommendations
- Referring Clinician User ID is **optional** and only required for analytics
- Referring Clinician Professional Identifier (e.g. GMC number, NPI number) is **optional** and only required for analytics
- Department is **optional** and only required for analytics
- Specialty is **optional** and only required for analytics
- Practice location and/or site is **optional** and only required for analytics
- Email is **optional** and only required for analytics

Why do we have this data?

We collect information about you to process your request for diagnostic testing, and to present you with relevant practice guidelines, where available, for your indicated clinical scenario. This, along with any actions you take within MedCurrent CDS platform in relation to a given request, are recorded and presented in the MedCurrent Analytics module. Your data is shared with members of your management team to be used for auditing and reporting purposes to facilitate ongoing assessments of quality/delivery of care at your healthcare facility or institution.

We may share this information with Data Privacy Officers or equivalent resources affiliated with healthcare organizations where MedCurrent CDS Software is deployed. MedCurrent will not share your information for marketing purposes with external companies.

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information are: **Article 6(1)(f) Legitimate interests.**

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Staff:

So that we can provide a safe and professional service, we need to keep certain records about you. We may record the following types of data:

- Your basic details and contact information e.g. your name, address, date of birth, National Insurance number and next of kin;
- Your financial details e.g. details so that we can pay you, insurance, pension and tax details;
- Your training records.

We also record the following data which is classified as "special category":

- Health and social care data about you, which might include both your physical and mental health data – we will only collect this if it is necessary for us to know as your employer, e.g. fit notes or in order for you to claim statutory maternity/paternity pay;

As part of your application you may – depending on your job role – be required to undergo a Disclosure and Barring Service (DBS) check (Criminal Record Check). We do not keep this data once we've seen it.

Why do we have this data?

We require this data so that we can contact you, pay you and make sure you receive the training and support you need to perform your job. By law, we need to have a lawful basis for processing your personal data.

We process your data because:

- We have a legal obligation under UK employment law;
- We are required to do so in our performance of a public task;

We process your special category data because

- It is necessary for us to process requests for sick pay or maternity pay.

If we request your criminal records data it is because we have a legal obligation to do this due to the type of work you do. This is set out in the Data Protection Act 2018 and the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. We do not keep a record of your criminal records information (if any). We do record that we have checked this.

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We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent.

How we store your personal information?

Customers:

Your information is securely stored on Microsoft Azure data centres located in the territory where customer is physically located.

United Kingdom Customer data is hosted in Microsoft Azure data centres located in the United Kingdom. United States of America Customer data is hosted in Microsoft Azure data centres located in the United States of America. Canadian Customer data is hosted in Microsoft Azure data centres located in Canada. Australian Customer data is hosted in Microsoft Azure data centres located in Australia.

The data is completely encrypted in transit and at rest.

We keep Sex, DOB, Referring Physician Full Name, Referring Physician Identifier for the entire duration of a customer contract. We will then dispose your information by backing and encrypting customer databases and returning data in secure manner to customer(based on customer preference). After data is securely returned to customer, original databases hosted on Microsoft Azure will be permanently deleted using Microsoft Azure tools for data deletion.

Staff:

Your information is securely stored on Cloud based business systems that have been reviewed for maintaining proper privacy and security posture and have been approved by the management team. The data is completely encrypted in transit and at rest.

Other applications and websites

We may send your details to an integrated system, such as electronic patient or medical records (EPR or EMR), order comms, ordering portals, and radiology information systems (RIS) for further processing as part of the diagnostic testing request workflow.

There may be links on various screens in the MedCurrent CDS solution that direct to other websites, so when you link to other applications or websites you should read their own privacy policies.

The MedCurrent homepage website may collect tracking cookies to collect domain names and IP addresses of our visitors for statistical purposes, to measure use, to improve the content or

responsiveness of the MedCurrent homepage, or to customise the content or layout of the site for the individual visitor. We do not disclose this information to third parties. We may also aggregate information relating to our visitors' traffic patterns from the data that we collect and retain concerning the IP addresses and domain names of our visitors, and we may divulge such aggregate information about our users with third parties such as our business partners, distributors, and service and support providers. The visitor is required to accept essential cookies and may customize functional, analytical and marketing cookies are used.

Notwithstanding, however, the MedCurrent homepage contains a contact form that captures name, email, telephone number and other information from a user submitting an information request. This data will strictly be used for follow-up contact, sales and other business related activities, however, will not be shared with external third parties.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Changes to our privacy policy

We keep our privacy policy under regular review and we will make any necessary updates on this page. This privacy policy was last updated on November 10, 2026.

How to contact us?

If you have any concerns about our use of your personal information or have any questions about this policy, you can contact us at:

UK:

Name: MedCurrent UK Ltd. Attn: Privacy and Security Officer

Address: 5 SOUTH CHARLOTTE STREET, EDINBURGH, EH2 4AN, UNITED KINGDOM

Phone Number: +44 (0) 141 488 0915 x2

E-mail: compliance@vitalhub.com

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk

International:

Name: VitalHub Corp. Attn: Privacy and Security Officer - MedCurrent

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