

GoodSAM Data and Privacy Policy

Welcome to GoodSAM's privacy policy. Governance and Security are at the core of GoodSAM and we are committed to respecting your privacy and protecting your personal data.

1. Introduction:

This privacy policy tells you how the GoodSAM Ltd group of organisations use your personal data - when you contact us, sign up to our newsletter, use GoodSAM as an Alerter and/or Responder, and as organisation on the GoodSAM platform.

We think this is really important and hence have written this as clearly and openly as possible to minimise legalise. Please read it so you are fully aware of how and why we use your data. This policy (together with our Terms and Conditions) sets out the basis on which any personal data we collect from you, that you provide to us, or which we hold about you, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we treat it.

This latest version of our privacy policy was updated on 19th May 2018. It will be regularly updated as new features requiring explanation are added and as further clarity is required.

If you have any questions from it, please email us at: info@goodsamapp.org

2. GoodSAM data controller:

GoodSAM Ltd provides technical services to organisations to facilitate emergency response, crowdsourcing of care and an ability to remotely triage patients. GoodSAM's registered office is at:

- GoodSAM Ltd, 1 Curtain Rd, London EC2A 3JX

GoodSAM is the data controller responsible for the website and apps and the processing of data within them.

3. Personal data we collect about you:

Personal data recorded depends on your method of interacting with us. Where you have requested that we provide a specific service (as detailed below), we will process your personal data in order to perform that service or meet your request:

Friends of GoodSAM: If you sign up to the GoodSAM Newsletter, you have given consent for us to intermittently contact you with news from GoodSAM. Every subscriber has opted into this - we do not obtain email addresses from other sources and do not use pre-checked "keep me informed" boxes. At the bottom of

every email is an “Unsubscribe” button. We don’t email much but if you do want to withdraw consent, simply click that and we’ll go away!

GoodSAM Alerter: If you register as an Alerter, we record some basic data. If you use single sign on, this comprises some very basic identifier data passed from Google/Facebook/LinkedIn. If you register manually, we store basic identifiers, your phone number and additional information that you can consent to provide if you wish. This includes some Special Category Data. This is health related data such as past medical conditions, current medication and allergies. The lawful basis of using this data is that in addition to your consent it has vital interests if you are unwell (may convey useful life saving information). You can always remove / modify this health data; though we would encourage you to keep it as up to date as possible. This data may be passed to responders attending scene (so they can provide more appropriate help) and to the emergency services of the region if you have triggered an alert. The lawful basis of passing this information is that it is in vital interest to save life (yours!) and by providing the additional information you have consented to this.

We do not process any location data when using the GoodSAM Alerter App unless you trigger an alert. Knowledge of your location is critical to system function and that data may be passed to the local emergency services and local GoodSAM Responders. This is a vital interest to life. The data is stored as a legitimate interest for future analysis / audit.

GoodSAM Responder: As a GoodSAM Responder we are required to hold certain data about you. This includes basic identifier information and evidence of identity/training. This is a legal obligation through contracts with emergency services and essential to robust governance of the platform. Additionally, there is a range of additional data that you can add through your account profile. This includes additional images, whether you have an AED on you or a profile photo etc. This additional data is voluntary and given by consent but is processed as a legitimate interest to ensure the essential running of the GoodSAM platform is possible.

For GoodSAM to be able to alert Responders close to an emergency, the system needs to know your location. The system therefore receives regular updates of your location. No historical location data is stored. If you are activated and accept an alert, your location data is recorded for this event only. The legitimate interest underlying this enables establishment of information such as time to scene.

Information you voluntarily provide when you contact us: If you contact us by phone or email, we may keep a record of that correspondence in case we need to contact you in relation to the issue for which you contacted us or operational performance improvement. If you report a problem to us, we may keep a record of that information in case we need to contact you in relation to the issue for which you contacted us. The information which you give may include your name, email address and details regarding your Responder or Alerter account. If you are a business, when you contact us, the information which we collect may include: your

name, email address and telephone number; the name of your business and your business title and your business address.

We do not store any financial or transaction data for GoodSAM Alerters or Responders

4. Cookies

You may be aware that some organisations use cookies / information from 3rd parties to track browsing habits and target advertising specifically to your interests. GoodSAM does not use cookies at all for these purposes.

Similarly, we do not provide cookies to third parties.

We do, however, use cookies to remember your preferences within the GoodSAM website and from third parties as part of single sign on.

5. Disclosure of personal data

The GoodSAM platform works with multiple organisations (for example London Ambulance Service, Ambulance Victoria, East Midlands Ambulance Service, St John New Zealand...). We have a legal requirement to be able to report who attended specific incidents. Additionally, organisations on the platform have access to personal data of staff / members who register under their organisation on the platform. In registering under that organisation, the individual is giving consent to this, however the overarching lawful basis is the legitimate interest in this being vital for the system to function. We will only share your information with our partner organisations, where we have your permission to do so or where we believe it is necessary for a legitimate reason connected with the app or our services. We only share your information with these third parties who have equivalent security and privacy terms as us. GoodSAM does not pass on any other data to non-partner organisations without specific consent or unless required to by law.

6. AED (Automated External Defibrillator) data

GoodSAM records AED data uploaded by the community, including location, images, availability times, access codes etc. We also store personal data affiliated to the AED, for example, identity and contact details of the guardian (if known) and / or the individual who uploaded the AED data. Most of the guardians are companies / organisations that for example have AEDs on their premises. The lawful basis for storing this data is the legitimate interest in that the data is required to be able to inform people of AED locations and their availability.

GoodSAM does not sell AEDs and has no vested interest in AED data. We provide AED data at no cost to partner ambulance services and agree to share data. We display data within the Apps in an open but location-controlled manner - you can only see AEDs close to your current location.

7. Audio / Messaging Data

Within the Apps it is possible to transmit messaging data (text and audio). This data is encrypted and only viewable / audible to the intended recipient. The lawful basis for processing this data is the legitimate interest to enable the function of the platform to work. It may also have vital interests when the message being transmitted pertains to a life-threatening emergency.

8. Video Data

Video data can be transmitted in 2 ways. Firstly, from within the Apps. This video (and audio) data passes directly to ambulance control. The emergency service has control over whether this data is recorded or not (none is stored on the callers mobile phone). This data can be viewed by administrations on the platform.

Secondly, video can be transmitted independent of Apps. This is achieved through a text message link that opens a URL that opens the camera. The caller agrees to share video / audio and location data via a pop-up message before any information is transmitted. Again, the emergency service has complete control as to who is able to see this footage.

If the service choose to store video / audio data (in the same way a 999 call is recorded) that data is stored encrypted and for the length of time deemed necessary for legal reasons. The lawful basis for storage of this data is the legitimate interest in keeping notes as evidence in a similar manner to good record keeping for medical purposes

9. Data Sharing and Storage:

GoodSAM does not provide data to organisations other than those that use data for the lifesaving benefits intended as outlined above. These organisations themselves agree that this data is not passed outside their organisation and used exclusively for the purposes of agreed with us. Clearly, the lawful reason to share data is the vital interest of saving lives by enabling the service to work. In using utilising our Service, users consent to the processing of their personal data.

The data which we collect from you may, on occasion, be transferred to countries outside the European Economic Area (EEA). This is for the legitimate purpose of ensuring the GoodSAM platform is available globally and able to facilitate live saving intervention worldwide. This includes, for example, the locations of Responders and Alerters and where Responders accept alerts outside of the EEA. Where a Responder accepts an alert outside of the EEA, the alerting service may receive details of the Responder (acceptance of alert, time to scene, basic identifiers - ie. email). Countries outside of the EEA may not have laws which provide the same level of protection to your personal data as laws within the EEA. Where this is the case, we will put in place appropriate safeguards to ensure that such transfers comply with applicable data protection laws.

10. Keeping your Information Secure:

Security is central to GoodSAM and we take the security of our users very seriously. Unfortunately, the transmission of information via the internet is never completely secure. Whilst we cannot guarantee the security of your data transmitted to our site, and any transmission is at your own risk, we use highly strict procedures and security features to prevent unauthorised access. For example, our system are hosted on Amazon infrastructure and we follow strict policies as to our handling of personal data and conduct regular reviews of our infrastructure and server security. All staff are trained in the proper handling of personal data and observe our data handling policies.

11. How long we keep your information

We will retain your personal data for as long as you wish to be communicated with from us or use our Apps and for a reasonable period of time since you ceased using the Apps. The length of time we keep the personal data will vary dependent on how long we need to personal data to deliver, maintain or improve our services and whether we require the information as part of a dispute or to comply with a legal obligation (including responding to a regulatory or statutory Emergency Service). Please note that we may also be required to retain certain information by law.

12. Summary:

We think it is important that you are able to control your personal information. You have the right to ask us not to process your personal information. The law also gives you the right to request a copy of the personal information we hold about you. We will comply with your requests in accordance with the applicable law. You can also exercise your right to prevent such processing at any time by contacting us.

This policy explains the lawful reasons for data usage and processing within GoodSAM and partners. It will be updated, so please do check it and contact us on info@goodsamapp.org if you have queries / questions / comments. We really do welcome any questions, comments and requests you may have regarding this Policy.

Purpose / Activity	Type of Data	Lawful basis for processing
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Friend of GoodSAM newsletter or contacting GoodSAM to report issues / business purposes	Identity Contact	Consent (opt in only - you have to enter your email address to subscribe to newsletter - no pre-ticked consent boxes ever used)
GoodSAM Alerter	Identity Contact Special Category (health) data Location data (in event of emergency)	Legitimate interest Legitimate Interest Vital Interest to save life Vital Interest to save life
GoodSAM Responder	Identity Contact Image of Evidence of training / ID Profile Image Special Category (health) data Location data (continuous)	Legitimate interest Legitimate Interest Legal requirement Consent Vital Interest to save life Vital Interest to save life
GoodSAM Partner Organisations	Location data Administrator contact data (same as alerter / responder)	Legitimate interest to centre maps on Head quarters / dispatch control
AED Data	Location data Availability hours Image Guardian	Vital Interest to save life Vital Interest to save life Vital Interest to save life Legitimate Interest
Audio / Messaging Data	Text Data / Audio Data	Legitimate Interest and sometimes Vital Interest to save life (depending on message data)
Video Data	Video Data	Legitimate Interest and sometimes Vital Interest to save life (depending on message data)

Summary table of GoodSAM's lawful use of data