

# WORLD HEALTH RECORD

## Privacy Notice

**Last updated:** 16 Dec 2025

This Privacy Notice explains how **Innovations Infinite Ltd** (“we”, “us”, “our”) collects, uses and protects your personal data when you use **World Health Record** (“WHR” or the “Service”).

We are committed to protecting your privacy and handling your personal data in a lawful, fair and transparent way.

## 1. Who we are and how to contact us

### Controller identity

For most uses of WHR, **Innovations Infinite Ltd** acts as a **data controller** of your personal data, in particular where:

- you create a WHR account as a Patient, Family Member or Family Admin; or
- we process your personal data to operate, secure and improve WHR, or to meet our own legal and regulatory obligations.

Where a Hospital, Clinic, Laboratory, Pharmacy or other Healthcare Provider uses WHR to view or add information about you:

- that organisation will be a separate data controller for the data it holds and uses in its own systems and for its own purposes; and
- when you deliberately share your WHR data with that organisation (for example by granting access or using a sharing / export feature), that organisation will become an independent controller of the copy of your data that it receives.

Their own privacy notices apply to their processing. This Privacy Notice covers what we do with your data in WHR.

### Company details

Innovations Infinite Ltd, 450 Brook Drive, Reading, RG2 6UU, United Kingdom

Company number: 06487267

### Contact for privacy matters

Email: [Privacy@HealthRecord.World](mailto:Privacy@HealthRecord.World)

Postal: Privacy Officer, World Health Record, Innovations Infinite Ltd, 450 Brook Drive, Reading, RG2 6UU, United Kingdom

If we appoint a Data Protection Officer (DPO) in future, we will update this Privacy Notice with their contact details.

## 2. What this Privacy Notice covers

This Privacy Notice applies to:

- Individuals who use WHR as:
  - Patients
  - Family Members / Family Admins
- Staff of organisations who use WHR, including:
  - Healthcare Professionals (doctors, nurses, allied health)
  - Hospital / Clinic / Lab / Pharmacy staff and admins
- Visitors to our websites and apps for World Health Record.

Currently, WHR is used primarily as a private service by patients and families. Over time, more hospitals, clinics, laboratories and pharmacies may join WHR, and patients and Family Admins may choose to share their WHR data with those organisations.

This Privacy Notice does **not** cover:

- How your Healthcare Provider uses your data in their own systems (for example, their EHR, prescribing or lab systems).
- Third party apps or services you connect to WHR (for example via an API integration).

Those parties are responsible for their own privacy notices.

## 3. Types of data we collect

Because WHR is a health record platform, we process some special category data, in particular health data, alongside general personal data.

### 3.1 Data you or your organisation provide

When you sign up, use WHR or are added as a user, we may collect:

#### Identity and account data

- Name, title
- Contact details (email, phone)
- Date of birth
- Role (e.g. Patient, Family Member, Family Admin, clinician, pharmacist)
- Organisation details (hospital, clinic, lab, pharmacy)

#### Health Record Data

Depending on how you use WHR, this may include:

- Medical history and diagnoses
- Medications and prescriptions
- Allergies and intolerances
- Test results and reports

- Vaccination records
- Treatment notes and care plans
- Appointment history
- Uploaded documents (e.g. discharge summaries, letters, images, PDFs)
- Other health related information you choose to store

#### **Family / relationship data**

- Links between Patients, Family Members and a Family Admin
- Information about dependants (including children), where a parent/guardian or lawful representative manages their record.

#### **Organisation / professional data (for healthcare staff)**

- Role, specialty, job title
- Organisation name and address
- Professional registration number (if provided)

### **3.2 Data we collect automatically**

When you use WHR, we may collect:

#### **Usage data**

- Log in dates and times
- Features used, clicks and navigation
- Session duration

#### **Device and technical data**

- IP address
- Browser type and version
- Device type and operating system
- App version

#### **Security and audit data**

- Who viewed, added or changed which records and when
- Sharing events (e.g. exports, shared links, API access granted)

### **3.3 Data from other sources**

We may receive data about you from:

- Family Admins who create or manage a record on your behalf
- Healthcare Providers who you allow to upload or view your records in WHR
- Third party systems you choose to connect via API or integration, where you authorise data to flow into WHR.

Those parties are responsible for ensuring they have a lawful basis to share your data with us.

## 4. Purposes and legal bases for processing

We process personal data only where we have a lawful basis under UK GDPR / EU GDPR.

### 4.1 To provide and operate the WHR Service

#### What we do

- Create and manage user accounts
- Store, display and organise Health Record Data
- Enable you to share and manage your health record with family and, if you choose, with healthcare professionals and organisations
- Provide audit trails (who accessed or edited what and when)

#### Legal bases

- **Performance of a contract** (Article 6(1)(b) GDPR): where you sign up as a user of WHR or are registered as a user by your organisation.
- **Legitimate interests** (Article 6(1)(f)): our interest in providing a secure, user friendly health information platform.

#### For health data and other special category data:

- **Explicit consent** (Article 9(2)(a)): where you (or a Family Admin acting on your instructions or with lawful authority) actively provide or upload your Health Record Data or choose to share it via WHR; and/or
- **Provision of health or social care** (Article 9(2)(h)): where we provide WHR to Healthcare Providers as part of their care of you and act as their processor.

### 4.2 To secure and maintain the Service

#### What we do

- Monitor and protect against security incidents (e.g. hacking, DDoS)
- Manage access controls and authentication
- Detect and investigate misuse or abuse
- Carry out backups and disaster recovery

#### Legal bases

- Legitimate interests (Article 6(1)(f)): our interest in ensuring the security, availability and integrity of WHR.
- For health data in this context, we rely on appropriate grounds under Article 9 (for example, the need to protect your vital interests, substantial public interest, or healthcare related grounds) with suitable safeguards.

### 4.3 To improve and develop WHR

#### What we do

- Analyse overall usage patterns

- Fix bugs and improve performance
- Develop and test new features

#### Legal basis

- Legitimate interests (Article 6(1)(f)): improving WHR in a way that does not override your privacy rights.

### 4.4 To communicate with you

#### What we do

- Send essential service emails (e.g. account changes, security alerts, downtime notices)
- Send in-app messages about important updates or changes to this Privacy Notice
- Respond to support and help desk requests

#### Legal bases

- Performance of a contract (Article 6(1)(b)) for essential service communications.
- Legitimate interests (Article 6(1)(f)) for necessary operational communications.

#### For any optional marketing:

- Consent (Article 6(1)(a)) or legitimate interests, depending on the channel and your relationship with us, in line with e-privacy rules. You can opt out at any time.

### 4.5 To comply with legal and regulatory obligations

#### What we do

- Maintain records required by law
- Cooperate with regulators and law enforcement where required
- Handle legal claims and disputes

#### Legal bases

- Legal obligation (Article 6(1)(c))
- For health data, we rely on appropriate Article 9 grounds such as substantial public interest or legal claims, with appropriate safeguards.

### 4.6 Voluntary contributions / donations

If you choose to make a voluntary contribution to support WHR:

- We process your identity and payment data to receive and record the contribution and meet financial, accounting and compliance obligations.

#### Legal bases

- Performance of a contract and/or legitimate interests (administering contributions);
- Legal obligation (financial record keeping).

## 5. How and when we share your data

### 5.1 Sharing with healthcare providers, family and other users

WHR is designed to let you choose who can see your health record.

- As a Patient / Family Member / Family Admin, you can:
  - Share selected data with doctors, hospitals, clinics, labs and pharmacies you trust;
  - Share data with other family members;
  - Revoke access in WHR (subject to technical and organisational limitations – for example, we cannot “un-send” a PDF or email once delivered).
- As WHR becomes used by more healthcare organisations, they may invite you to link your WHR record to them. You can choose whether or not to accept that.

When you use WHR to export, download or share your Health Record Data with a third party (for example via PDF, email, shared link or an API connection), that recipient becomes an independent controller of the copy of data it receives and is responsible for its own compliance with data protection laws. Our World Health Record SaaS Agreement and in-app warnings reflect that once data leaves WHR and is outside our technical control, we are not responsible for that downstream processing.

### 5.2 Service providers (processors)

We use trusted third party service providers to help us deliver WHR, such as:

- UK based or EEA based cloud hosting providers
- Email and notification providers
- Customer support and ticketing tools
- Security and monitoring services

These providers act as our **processors** and may only process personal data:

- on our documented instructions;
- for the purposes we specify; and
- under contracts that include GDPR compliant data protection obligations.

### 5.3 Corporate transactions

If we are involved in a merger, acquisition, restructuring or sale of assets, personal data may be transferred to the relevant third parties, subject to confidentiality and appropriate data protection safeguards.

### 5.4 Legal and regulatory disclosures

We may disclose personal data where necessary to:

- comply with applicable laws or valid legal processes;
- respond to lawful requests from public or regulatory authorities;
- establish, exercise or defend legal claims.

## 6. Where your data is stored and international transfers

We currently host and store personal data for WHR on servers located in the United Kingdom.

We do not routinely transfer your personal data outside the UK or European Economic Area (EEA) as part of the normal operation of WHR.

If, in future, we need to transfer personal data outside the UK/EEA (for example, if we add a new service provider located in another country):

- we will only do so where we have a valid legal basis and appropriate safeguards in place (such as adequacy regulations, Standard Contractual Clauses or other recognised mechanisms); and
- we will update this Privacy Notice to explain the changes.

## 7. How long we keep your data

We keep personal data only for as long as reasonably necessary for the purposes described in this Privacy Notice and to meet legal, regulatory, tax, accounting or reporting requirements.

Examples:

- WHR account data: kept for as long as your account is active and for a limited period after closure (for example, to allow reactivation or handle queries), then deleted or anonymised.
- Health Record Data:
  - In personal/family accounts: kept until you or your Family Admin delete it, or close the account, subject to backup and legal requirements.
  - In organisational WHR accounts: retention may be governed by the organisation's own policies and legal duties as a Healthcare Provider.
- Logs and audit data: retained for a period necessary for security, audit and legal purposes, then anonymised or deleted.

## 8. Your rights

Under UK GDPR / EU GDPR, and subject to certain conditions and exceptions, you have the right to:

- **Access** your personal data
- **Rectify** inaccurate or incomplete data
- **Erase** personal data in certain circumstances (“right to be forgotten”)
- **Restrict** processing in certain circumstances
- **Object** to processing based on legitimate interests
- **Data portability** (for data you provided, where processing is based on consent or contract and carried out by automated means)

- **Withdraw consent** at any time, where we rely on consent (including explicit consent for some health data processing).

To exercise your rights, please contact us using the details in section 1. We may need to verify your identity before acting on your request.

Some rights can be exercised directly in the WHR app (for example, updating your profile or certain health information). Where your data is controlled by a Healthcare Provider using WHR, we may redirect some requests to that organisation if they are best placed to respond (for example, where they control the legal medical record).

## 9. Complaints

If you have concerns about how we handle your personal data, please contact us first so we can try to resolve the issue.

You also have the right to lodge a complaint with your local data protection authority. In the UK, this is:

### **Information Commissioner's Office (ICO)**

Website: [www.ico.org.uk](http://www.ico.org.uk)

Telephone: +44 (0)303 123 1113

## 10. Is providing your data mandatory?

You are not legally required to use WHR or to provide us with your health data. However:

- If you choose not to provide certain information, some WHR features may not work or may be limited.
- If your Healthcare Provider uses WHR, they may require certain information in order to safely deliver care to you.

Where we collect personal data:

- we will indicate where it is required for the Service (e.g. basic registration details); and
- where it is optional.

## 11. Automated decision making

WHR does not currently use your personal data to make automated decisions that have legal or similarly significant effects on you, within the meaning of GDPR Article 22.

If this changes, we will update this Privacy Notice and provide any additional information required by law.

## 12. Security

We use appropriate technical and organisational measures to protect your personal data, including:

- Hosting in reputable UK based data centres

- Encryption in transit and, where appropriate, at rest
- Access controls and role based permissions
- Logging and audit trails
- Regular security updates and vulnerability management
- Backups and disaster recovery measures
- Staff training and confidentiality obligations

No system is completely secure, but we work to protect your data in line with good industry practice. If we become aware of a personal data breach likely to result in a risk to your rights and freedoms, we will notify you and, where required, notify the relevant supervisory authority.

## 13. Third party links and services

WHR may include links to websites, apps or services not controlled by us. We are not responsible for the privacy practices of those third parties.

When you connect WHR to a third party service (for example via API), we will:

- clearly explain what data will be shared; and
- ask for your explicit permission before sharing.

Once shared, the third party is responsible for its use of that data under its own privacy notice.

## 14. Changes to this Privacy Notice

We may update this Privacy Notice from time to time, for example to reflect:

- changes to WHR's features;
- changes in law or regulatory guidance; or
- feedback from users or regulators.

We will publish the updated version on our website and show the "Last updated" date at the top. If the changes are significant, we may also notify you directly (e.g. by email or in-app message).

## 15. Contact us

If you have questions about this Privacy Notice or how we process your personal data, please contact:

Email: [Privacy@HealthRecord.World](mailto:Privacy@HealthRecord.World)

Postal: Privacy Officer, World Health Record, Innovations Infinite Ltd, 450 Brook Drive, Reading, RG2 6UU, United Kingdom