

# Privacy Policy for PROMs App

## 1. Introduction

This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you use the PROMs app (<https://proms-1.giftysolutions.com:3000/>). The PROMs app is designed to measure patient-reported outcomes and manage hospital, staff, doctor, and patient data securely and in compliance with data protection regulations.

By using our app, you agree to the collection and use of your information in accordance with this policy.

## 2. Data We Collect

### 2.1. Patient Data

- **Personal Information:** Name, Date of Birth, Phone Number, Medical Record (MR) Number, and Appointment Details.
- **Health Information:** PROMs survey responses related to your health status, doctor's notes, ICD codes, and medical history.

### 2.2. Doctor Data

- **Personal Information:** Name, Username, and Password.
- **Patient Data:** Access to assigned patients' details including personal and health information for analysis and decision-making.

### 2.3. Staff Data

- **Personal Information:** Name, Username, and Password.
- **Patient Management:** Access to patient appointment scheduling, edits, and data uploads.

### 2.4. Hospital Admin and Super Admin Data

- **Personal Information:** Name, Username, and Password.
- **Hospital Management:** Access to manage hospitals, specialties, and staff, and view anonymized hospital-level data.

## 3. How We Use Your Data

We use your data to:

- Facilitate patient-doctor interactions through PROMs surveys.
- Enable doctors to view and analyze patient progress.
- Provide hospital-level insights for hospital and super admins.
- Ensure the proper functioning of the app and improve healthcare outcomes.

## 4. Legal Basis for Processing

We process personal data in accordance with:

- **GDPR (General Data Protection Regulation)** for users based in the EU.
- **HIPAA (Health Insurance Portability and Accountability Act)** for healthcare-related data in the US.
- Explicit user consent is obtained before processing any personal data.

## 5. Data Sharing and Disclosure

- **Third Parties:** We do not share your personal data with third parties unless necessary for app functionality (e.g., cloud hosting, data storage).
- **Data Processors:** We have signed Data Processing Agreements (DPA) with any third-party vendors that may handle your personal data, ensuring GDPR and HIPAA compliance.

## 6. Security of Your Data

We implement strict security measures to protect your data:

- **Encryption:** All personal data is encrypted both at rest (AES-256) and in transit (SSL/TLS).
- **Access Controls:** Role-based access ensures that only authorized personnel can access sensitive information.
- **Audit Logs:** All actions are logged for security monitoring and accountability.

## 7. Data Retention Policy

- **Patient Data:** Retained for a minimum of 5 years or as required by local health regulations. After this period, data will be anonymized or securely deleted.
- **Staff, Doctor, Admin Data:** Retained for the duration of employment or service and deleted 6 months after termination.

## 8. Your Data Rights

Under the GDPR and HIPAA, you have the following rights:

- **Access:** You may request a copy of your personal data.
- **Correction:** You can request corrections to inaccurate or incomplete data.
- **Deletion:** You can request the deletion of your data where applicable.
- **Data Portability:** You can request a copy of your data in a portable format.

To exercise these rights, contact our support team at [privacy@promsapp.com](mailto:privacy@promsapp.com).

## 9. Data Breach Notifications

In the event of a data breach, we will notify affected users and relevant authorities within 72 hours, as required by GDPR and HIPAA.

## 10. Changes to the Privacy Policy

We may update this policy from time to time. You will be notified of any changes via email or through our app.

## **11. Contact Information**

For questions or concerns regarding this Privacy Policy, please contact us at:

- **Email:** [privacy@promsapp.com](mailto:privacy@promsapp.com)
  - **Address:** PROMs App, 123 Health St, Las Vegas, NV, USA
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