# The Lowdown Privacy & Cookie notice

We are Get the Lowdown Ltd with company number 11739412 and registered address of 1 Lancaster Place, London, TW1 1HR ("Lowdown", "we", "us" "our").

We are registered with the Information Commissioner's Office ("ICO") as a data controller under registration number ZA483421.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our data protection officer at hello@thelowdown.com.

## How do we use your data?

Women's health reviews and experiences. If you want to leave a review, experience or comment on a review on our website, by default we provide you with an anonymous username which is linked to your account. You can change your account settings to personalise your account but this will mean your username is made publicly available when you post your review or comment on a review. We publish your review or experience on the basis of our legitimate business interest of sharing knowledge about topics like contraception, endometriosis and menopause, and because the processing is necessary for reasons of public interest in the area of public health. With your consent, we may collect information about your ethnicity. Provision of information about your ethnicity is entirely optional. We may also carefully anonymise your review and share this anonymised data to transform women's health and improve women's healthcare. If you withdraw your consent to us using information about your ethnicity, we may continue to use the anonymised data, but can remove this information from your account if you request it.

**Prescriptions:** If you purchase a contraception prescription through us, we collect information including your prescription details, name, contact details, delivery details, payment details, date of birth, height, weight and medical history. We collect these details to fulfil our contractual obligations to you and for the provision of health care services from a health professional. When you request your prescription we will ask you if you'd like us to notify your GP. If you want us to notify them, we will ask for your GP's name and address and send them a letter telling them that we have prescribed you this medicine.

When you register an account with us. If you create an account with us to use our services, for example to buy a prescription, use a tool, or leave a review or a comment, we collect information including your name, contact details, username and password. You can also provide more details

within in a account settings. We collect these details to fulfil our contractual obligations to you.

Contraceptives Consultations Pharmacy Doctor appointment through us to speak with a doctor, we collect information including your Walner, contract details, payment details, appointment details and medical history. Our doctors also make detailed notes of your consultation which we keep on file to ensure we are compliant with healthcare regulations. We collect these details to fulfil our contractual obligations to you and for the provision of health care services from a health professional.

**Get in touch.** If you contact us, we will collect your name, contact details and query because it is in our legitimate interest to make sure we can properly respond to your query.

News, updates and special offers. If you sign up to receive our newsletter or any special offer we will collect your name and contact details. When we send you our news updates or provide you with a special offer it is because you have opted-in to receive them and we rely on your consent to contact you. You can unsubscribe from our updates at any time by responding to any email you receive from us to tell us you wish to unsubscribe or by emailing hello@thelowdown.com.

**Webinars.** If you attend one of our online webinars we will collect your name and contact details. We collect these details as it is in our legitimate interest to provide you with the webinar and contact you about the event.

**Research.** With your consent, we may process your personal data in order to anonymise it. We may then use that anonymised data, which can no longer be used to identify you and is therefore no longer personal data, for any purpose, including to work with pharmaceutical companies, biotech companies, research organisations and journalists to advance innovations and developments in the women's health space. If you withdraw your consent, we may continue to use the anonymised data, but will not anonymise any more of your personal data for these purposes.

**Testimonials.** If you provide us with a testimonial we may publish this on our website or otherwise use it for our internal business purposes. We will anonymise any testimonials unless we have your consent to use your name. We process this information as it is in our legitimate interests to promote our business.

**Surveys.** If you participate in our surveys we collect your name and opinion. We may anonymise and aggregate this data to produce statistics. We collect this information for our legitimate interest of sharing knowledge about women's health and because the processing is necessary for reasons of public interest in the area of public health.

**Recommendations and tools.** If you complete a form to get a recommendation about which form of contraception you should use, or use one of our tools, we collect your name, contact details and medical information. We collect this information as it is in our legitimate business interest to provide you with our services and for the provision of health care services from a health professional.

Techn contraction when you use our website. When you consent, we collect technical information Contraceptives Consultations Pharmacy about ... who use use this information to improve our website and to better understand from people use it. For detail on the information we collect and how we do this is set out in our cookies policy below.

**Job applications.** If you apply for a job with us we collect your name, contact details and recruitment information such as your right to work documentation, references and qualifications. We will use this information to assess your suitability for our available roles. We do this to perform our contractual obligations or to take steps before entering into a contract. Where we process your right to work documentation, we will do so to comply with our legal obligations.

## Who do we share your data with?

#### Review, experience and tool data:

- With your consent, we may process your personal data in order to anonymise it. We may then use that anonymised data, which can no longer be used to identify you and is therefore no longer personal data, for any purpose, including to work with pharmaceutical companies, biotech companies, research organisations and journalists to advance innovations and developments in the women's health space.
- If you withdraw your consent, we may continue to use the anonymised data, but will not anonymise any more of your personal data for these purposes.

#### Prescriptions:

- If you place an order from us for a contraception prescription we will share your information with our registered pharmacy provider Phlo Technologies Ltd to provide this prescription service.
- To help with identity and age checks for our prescriptions customers, Phlo's pharmacy team may use the data you provide us with to check your NHS Summary Care Record (SCR). They will only do this if they have concerns that you are under 18 or using another identity, and they can check your name and date of birth without needing to go into your patient care record itself.
- If you order a prescription through us and subsequently contact The Lowdown customer support team to discuss your medication or book a consultation with one of The Lowdown's doctors, we are obliged to pass the information you give us during these interactions onto Phlo to ensure they have a complete view of you and your medical history.
- If the Phlo pharmacy team needs to contact you for any reason to discuss your prescription
  request, they will include a member of The Lowdown's customer support team in the
  communication so that we are able to understand and assist you with any refunds or issues as
  quickly as possible.

#### Appoint it nts:

- Contraceptives Consultations Pharmacy

   It, Julyouk a., appearant to speak with a doctor through us we will share your information with the registered general practitioners which we work with.
- Our doctors make detailed notes of your consultation which we keep on file. They are able to hare these notes with other general practitioners who run our consultation services, to ensure they are providing quality care.

#### We may also share your data with the following third parties:

- Professional advisors such as our lawyers, bank, auditors or insurers;
- Law enforcement, government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation; and
- Our suppliers or subcontractors for the performance of any contract we enter into with you.
- Social networks such as Facebook and Instagram (we will only share your email address) to identify individuals with similar interests to you who are likely to be interested in and will benefit from The Lowdown. We do this because of our legitimate interest to promote our business.

## Where do we store your data?

We store your data in the UK.

If we need to transfer your personal data outside of the UK, we will ensure it receives additional protection as required by data protection law. You can contact us at hello@thelowdown.com for more detail on the relevant data transfer mechanism used.

## How long do we keep your data for?

We will only retain your personal information for as long as we need it unless we are required to keep it for longer to comply with our legal, accounting or regulatory requirements.

We will delete dormant accounts after 3 years of no activity. We will anonymise and keep reviews indefinitely.

## What are my rights under data protection law?

You have various rights under applicable data protection law, including the right in certain circumstances to:

- access your personal data;
- correct incomplete or inaccurate data we hold about you;
- erase the personal data we hold about you;

- resprint our handling of your personal data;
- t aı sıer your personal data to a third party;
- Contraceptives capacition have we are using your personal data; and (https://tholoudayana
- Consultations
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Please keep in mind that data protection law is complicated, and these rights will not always be available to you all of the time.

You also have the right to lodge a complaint with us or the ICO, the supervisory authority for data protection issues in the UK. If you are based outside of the UK, you can find your relevant supervisory authority here (https://ec.europa.eu/justice/article-29/structure/data-protectionauthorities/index\_en.htm).

## Cookies policy

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

Cookie	Purpose	Duration
Google Analytics	This cookie is installed by Google Analytics. This helps us understand how you use the Website and helps us to improve your experience. These cookies may track how long you spend on the website and the pages you visit.  Read about Google Analytics here  (https://support.google.com/analytics/answer/6004245)	The retention period will be between 1 minute and 2 years depending on the type of cookie used.
Google Tag Manager	This cookie is installed by Google Analytics. Google Tag Manager allows us to create tags that collect data from website visitors. We then use those tags to measure how customers are interacting with the site. We also set up triggers so that certain actions automatically trigger new tags or update existing ones.	1 year

Google Ads d (https:/	This cookie is installed by Google Analytics. The cookie is used to store in a first of how the website is doing. The data collected includes the number of visitors, the source where they have come from, and the pages visited in an anonymous form, which is then utilised to personalise ads. It tracks visitors across devices and marketing channels.  Read about Google ads here  (https://policies.google.com/technologies/partner-sites)	24 hours  Pharmacy
Facebook	To measure the effectiveness of our Facebook and Instagram advertising. This is important as it means we can make informed investment decisions about our advertising. This may help us contribute to our overall mission of reducing prices for customers over time.  This can also help us prevent advertising irrelevant content to users, e.g. advertisements encouraging users to sign up to The Lowdown when they have already done so.  The fr, _fbp, _tr, AA003 and ATN cookies are used by Facebook to obtain encrypted data about visitors and users of our website for the purposes of measuring advertising effectiveness, showing relevant advertising to certain groups of users and excluding other groups of users from seeing irrelevant advertising. For more info check out https://www.facebook.com/policy.php	5 years
PostHog	This cookie is installed by PostHog. The cookie registers a unique ID that is used to generate statistical data on how you use our website.  Read more about PostHog here (https://posthog.com/privacy)	1 year

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

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## Changes to this policy

We have worked hard to create a privacy policy that's easy to read, and clear. But if you think we have used language that could be improved, or missed an important perspective, please just let us know by contacting us at hello@thelowdown.com. (mailto:hello@thelowdown.com)

This privacy policy was last updated on 25th March 2024.



