

## **Privacy Policy**

### **Missed Call Revenue Recovery Platform**

*Last updated: 29/01/2026*

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#### **1. Introduction**

This Privacy & Cookies Policy explains how we collect, use, store, and protect personal data when you use the **Missed Call Revenue Recovery Platform** (“the Platform”, “we”, “us”, “our”).

We are committed to complying with:

- UK Data Protection Act 2018
- UK GDPR / EU GDPR (where applicable)
- Information Commissioner’s Office (ICO) guidance
- Data protection best practices for healthcare-adjacent systems

This policy applies to:

- Dental clinics using the Platform
  - Authorized clinic staff (administrators, receptionists)
  - Website visitors
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#### **2. Roles & Responsibilities (GDPR)**

##### **Data Controller**

Each **dental clinic** using the Platform is the **Data Controller** for patient-related data processed through the system.

##### **Data Processor**

The Platform operates as a **Data Processor**, processing data strictly on behalf of the clinic and under contractual instructions.

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#### **3. What Data We Process**

The Platform is intentionally designed to **minimize personal data**.

##### **3.1 Call & Communication Data**

We process limited metadata related to phone calls, including:

- Call direction (inbound / outbound)
- Call status (missed, answered, voicemail)
- Call timestamps
- Callback timestamps

**Important:**

- **Raw phone numbers are never stored**
- Caller identifiers are **irreversibly hashed using SHA-256 with a secret salt**
- We cannot reverse or reconstruct phone numbers

### **3.2 Appointment & Recovery Data**

We process:

- Appointment creation timestamps
- Appointment attribution status (recovered / unattributed)
- Estimated revenue values provided by the clinic

No clinical notes, diagnoses, or treatment details are processed.

### **3.3 User & Clinic Data**

For platform access and billing:

- Clinic name and business contact details
- Authorized usernames, roles, and login credentials
- Authentication metadata (JWT tokens, login timestamps)

Passwords are securely hashed and never stored in plain text.

### **3.4 Website & Technical Data**

When visiting our website or dashboard, we may process:

- IP address (short-term, for security and analytics)
- Browser type and device information
- Usage analytics (aggregated and anonymized)

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## **4. Special Category Data**

The Platform **does not intentionally process clinical health records**.

However, call metadata may relate indirectly to healthcare services. For this reason, the system is designed to:

- Avoid storing special category data wherever possible
  - Apply enhanced security controls
  - Automatically delete call-related data after a fixed retention period
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## **5. Lawful Basis for Processing**

We process data under the following lawful bases:

### **5.1 Performance of a Contract**

Processing is necessary to deliver the Platform's services to clinics.

### **5.2 Legitimate Interests**

Processing is required to:

- Measure missed calls and callbacks
- Attribute recovered appointments
- Generate operational and revenue metrics

These interests do not override the rights of data subjects.

### **5.3 Legal Obligations**

Processing may be required to:

- Maintain audit logs
  - Meet accounting, tax, or regulatory requirements
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## **6. How We Use the Data**

We use data strictly to:

- Track missed calls and callbacks
- Attribute callbacks to appointments using deterministic rules
- Generate daily and monthly performance metrics
- Estimate recovered revenue

- Provide dashboards and reports to clinics
- Secure and operate the Platform

We **do not**:

- Sell data
  - Share data with advertisers
  - Perform automated profiling or machine-learning decision making
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## 7. Data Retention & Automatic Deletion

### Call-Related Data

- Retained for **90 days maximum**
- Automatically deleted via scheduled GDPR purge jobs
- Deletion is logged for audit purposes

### Metrics & Aggregates

- Stored in anonymized, aggregated form
- Cannot be traced back to individual callers

### User & Billing Data

- Retained for the duration of the clinic's account
  - Deleted or anonymized upon account termination unless legally required
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## 8. Data Sharing & Third Parties

We do **not** share personal data with third parties unless:

- Required to operate the Platform (e.g. hosting, email delivery)
- A written data processing agreement is in place
- Required by law

All sub processors are GDPR-compliant.

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## 9. Security Measures

We apply appropriate technical and organizational safeguards, including:

- SHA-256 hashing with secret salt for all sensitive identifiers
- Encrypted connections (HTTPS)
- Role-based access control
- Clinic-scoped data isolation (multi-tenant architecture)
- Audit logging of sensitive actions

No raw phone numbers or unnecessary PII are stored at any time.

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## **10. Data Subject Rights**

Under GDPR, individuals have the right to:

- Be informed about data processing
- Access their personal data
- Request correction of inaccurate data
- Request deletion (subject to legal limits)
- Restrict or object to processing
- Data portability
- Protection from automated decision-making

Requests should be made via the relevant dental clinic, who acts as Data Controller.

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## **11. Cookies Policy**

### **11.1 What Are Cookies**

Cookies are small text files stored on your device to improve website functionality and user experience.

### **11.2 Cookies We Use**

#### **Essential Cookies**

- Required for authentication and dashboard functionality
- Cannot be disabled without breaking the service
- Do not store personally identifiable information

#### **Analytics Cookies**

- Used to understand platform usage
- Aggregated and anonymized
- No individual tracking or profiling

### **Third-Party Cookies**

We may use trusted providers such as analytics or hosting services. These providers process data under GDPR-compliant agreements.

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### **12. Managing Cookies**

You can control cookies through your browser settings. Disabling cookies may impact functionality of the Platform.

Instructions vary by browser and device and are available via your browser's help documentation.

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### **13. International Transfers**

Where data is processed outside the UK or EEA, appropriate safeguards such as standard contractual clauses are in place.

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### **14. Complaints & Contact**

If you have questions, concerns, or complaints regarding data protection:

**Email:** [insert support email]

**Business Address:** [insert business address]

You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO):**

Telephone: 0303 123 1113

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### **15. Changes to This Policy**

We may update this policy from time to time. Material changes will be communicated to clinics using the Platform.