

Privacy & Cookies Policy

Missed Call Revenue Recovery Platform

Last updated: 29/01/2026

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.

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)

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.

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.

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.

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.

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.

13. International Transfers

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

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

15. Changes to This Policy

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