

# PRIVACY POLICY

## MedSearch Beta Testing Platform

**Effective Date:** 12/07/2025

**Last Revised:** 12/07/2025

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## 1. DEFINITIONS AND INTERPRETATION

### 1.1 Definitions

In this Privacy Policy, unless the context otherwise requires:

**"Controller"** means the Site Administrator of MedSearch, being the natural person who determines the purposes and means of processing Personal Data;

**"Data Subject"** means an identified or identifiable natural person who is the subject of Personal Data;

**"GDPR"** means the UK General Data Protection Regulation as retained and amended by the European Union (Withdrawal) Act 2018;

**"Personal Data"** has the meaning given in Article 4(1) of the GDPR;

**"Platform"** means the website located at [medsearch.org.uk](https://medsearch.org.uk) and all associated services, applications, and functionalities;

**"Processing"** has the meaning given in Article 4(2) of the GDPR;

**"Services"** means the beta testing services provided through the Platform;

**"Special Category Data"** means Personal Data revealing information about health, as defined in Article 9 of the GDPR;

**"User"** means any individual who accesses or uses the Platform.

### 1.2 Interpretation

References to statutory provisions include those provisions as amended, re-enacted, or superseded from time to time.

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## 2. CONTROLLER INFORMATION AND CONTACT DETAILS

### 2.1 Data Controller

The Data Controller for the purposes of the GDPR is:

**Site Administrator**

MedSearch Beta Testing Platform  
United Kingdom

### 2.2 Contact Information

For all data protection matters:

- **Email:** [support@medsearch.org.uk](mailto:support@medsearch.org.uk)
- **Subject Line:** "Data Protection Enquiry"

### 2.3 Regulatory Authority

The supervisory authority for data protection matters is the Information Commissioner's Office (ICO):

- **Website:** [ico.org.uk](http://ico.org.uk)
- **Telephone:** 0303 123 1113

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## 3. BETA TESTING STATUS AND LIMITATIONS

### 3.1 Platform Status

This Platform operates as a **beta testing environment** for the development and testing of professional networking services for medical professionals. The Platform is not a commercial service and operates solely for testing, development, and improvement purposes.

### 3.2 Inherent Risks

Users acknowledge that beta testing platforms may carry additional data processing risks compared to commercial platforms, including but not limited to:

- System instabilities and unexpected data processing behaviors;
- Incomplete security implementations;

- Temporary data accessibility issues;
- Limited technical support availability.

### **3.3 No Commercial Processing**

Personal Data is processed solely for beta testing purposes and platform development. No commercial exploitation of Personal Data occurs during the testing phase.

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## **4. CATEGORIES OF PERSONAL DATA PROCESSED**

### **4.1 Identity and Contact Information**

- Full legal name
- Email address
- Professional contact details

### **4.2 Professional Information**

- Medical school or healthcare institution affiliation
- Professional registration details
- Career stage and specialization
- Academic qualifications and certifications

### **4.3 Application Materials**

- Curriculum vitae and professional portfolios
- Research proposals and academic documents
- Cover letters and application materials
- Professional references and recommendations

### **4.4 Communications Data**

- Messages exchanged between Users through the Platform
- File attachments shared via the messaging system
- Communication preferences and settings
- Platform interaction histories

### **4.5 Research Opportunity Data**

- Research project titles and descriptions
- Location, hospital, and research centre information
- Time requirements and project duration details

- Data collection methodologies and participant requirements
- Applicant criteria and selection requirements
- Application contact information and URLs

#### 4.6 Job Application Data

- Application cover letters and personal statements
- Curriculum vitae and professional portfolios (up to 2GB file size)
- Supporting documents and references
- Application timestamps and submission records

#### 4.7 Technical and Usage Data

- Internet Protocol (IP) addresses
- Browser type, version, and configuration
- Operating system information
- Device identifiers and characteristics
- Platform usage patterns and navigation data
- Session duration and frequency of access

#### 4.8 Special Category Data

The Platform may inadvertently process Special Category Data contained within:

- Professional medical qualifications
  - Health-related research proposals
  - Clinical experience descriptions
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## 5. LAWFUL BASIS FOR PROCESSING

### 5.1 Primary Lawful Basis (Article 6 GDPR)

Processing is based on:

**(a) Consent** - Article 6(1)(a): Explicit consent provided by Data Subjects for beta testing participation;

**(b) Contract** - Article 6(1)(b): Processing necessary for performance of beta testing services;

**(f) Legitimate Interests** - Article 6(1)(f): Platform development, security, and improvement, where such interests are not overridden by Data Subject rights.

## 5.2 Special Category Data (Article 9 GDPR)

Where Special Category Data is processed, the additional lawful basis is:

**(a) Explicit Consent** - Article 9(2)(a): Specific consent for processing health-related professional information;

**(h) Health and Social Care** - Article 9(2)(h): Processing for health or social care purposes, including professional medical networking.

## 5.3 Withdrawal of Consent

Data Subjects may withdraw consent at any time by contacting [support@medsearch.org.uk](mailto:support@medsearch.org.uk). Withdrawal does not affect the lawfulness of processing prior to withdrawal.

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# 6. PURPOSES OF PROCESSING

## 6.1 Beta Testing Operations

- Platform functionality testing and validation
- User experience research and optimization
- Feature development and enhancement
- Performance monitoring and improvement

## 6.2 Service Provision

- User account creation and management
- Professional verification and authentication
- Research opportunity matching and applications
- Secure inter-user communications facilitation

## 6.3 Security and Compliance

- Platform security monitoring and threat detection
- Fraud prevention and detection
- Legal and regulatory compliance
- Data protection and privacy safeguarding

## 6.4 Platform Development

- Anonymous usage analytics and insights
- Platform performance optimization

- New feature development and testing
- User feedback collection and analysis

## 6.5 Research Opportunity and Application Processing

- Facilitating research opportunity postings and visibility
  - Processing job applications and matching candidates
  - Enabling communication between research providers and applicants
  - Managing application workflows and status tracking
  - File storage and retrieval for CVs and application materials
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# 7. DATA SHARING AND DISCLOSURE

## 7.1 No Commercial Sharing

Personal Data is not sold, rented, or commercially exploited in any manner during the beta testing phase.

## 7.2 Authorized Disclosures

Personal Data may be disclosed in the following circumstances:

- (a) User-Directed Sharing:** Information shared between Users as directed by Platform functionality;
- (b) Service Providers:** Third-party processors providing technical services under appropriate data processing agreements;
- (c) Legal Obligations:** Where disclosure is required by law, court order, or regulatory authority;
- (d) Vital Interests:** Where disclosure is necessary to protect vital interests of any person;
- (e) Public Interest:** Where disclosure serves a compelling public interest and is proportionate.

## 7.3 Third-Party Service Providers

Current and potential third-party processors include:

- **Hosting Providers:** UK-based web hosting services
- **Communication Services:** Email delivery and messaging infrastructure
- **Analytics Providers:** Website usage analysis services (if implemented)
- **Security Services:** Threat detection and monitoring services

## 7.4 International Transfers

Data processing occurs primarily within the United Kingdom. Any international transfers will be conducted with appropriate safeguards under Chapter V of the GDPR.

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# 8. DATA RETENTION

## 8.1 Retention Principles

Personal Data is retained only for as long as necessary for the purposes for which it was collected, subject to legal and regulatory requirements.

## 8.2 Retention Periods

- **Account Data:** Retained while account remains active plus 12 months
- **Communications:** Retained for 24 months or until account deletion
- **Application Materials:** Retained for 12 months or until withdrawal of consent
- **Research Opportunity Posts:** Retained for 24 months or until removed by poster
- **CV and Supporting Documents:** Retained for 12 months after application submission
- **Technical Logs:** Retained for 12 months for security and debugging purposes
- **Analytics Data:** Anonymized after 26 months if collected

## 8.3 Secure Deletion

Upon expiry of retention periods, Personal Data is securely deleted using industry-standard data destruction methods.

## 8.4 Legal Hold

Retention periods may be extended where data is subject to legal hold, regulatory investigation, or ongoing legal proceedings.

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# 9. DATA SUBJECT RIGHTS

## 9.1 Right of Access (Article 15)

Data Subjects have the right to obtain confirmation of whether Personal Data is being processed and access to such data.

## **9.2 Right to Rectification (Article 16)**

Data Subjects may request correction of inaccurate Personal Data and completion of incomplete data.

## **9.3 Right to Erasure (Article 17)**

Data Subjects may request deletion of Personal Data where:

- Data is no longer necessary for original purposes
- Consent is withdrawn and no other lawful basis exists
- Data has been unlawfully processed
- Erasure is required for legal compliance

## **9.4 Right to Restrict Processing (Article 18)**

Data Subjects may request restriction of processing in specific circumstances defined by the GDPR.

## **9.5 Right to Data Portability (Article 20)**

Data Subjects may receive Personal Data in a structured, commonly used format and transmit to another controller.

## **9.6 Right to Object (Article 21)**

Data Subjects may object to processing based on legitimate interests or for direct marketing purposes.

## **9.7 Rights Related to Automated Decision-Making (Article 22)**

The Platform does not currently employ automated decision-making or profiling that significantly affects Data Subjects.

## **9.8 Exercising Rights**

Rights may be exercised by contacting [support@medsearch.org.uk](mailto:support@medsearch.org.uk) with appropriate identification. Responses will be provided within one month of receipt.

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# **10. SECURITY MEASURES**

## **10.1 Technical Measures**



- Transport Layer Security (TLS) encryption for data in transit
- Advanced Encryption Standard (AES) 256-bit encryption for data at rest
- Multi-factor authentication for administrative access
- Regular security vulnerability assessments
- Automated intrusion detection and prevention systems

## 10.2 Organizational Measures

- Role-based access controls with principle of least privilege
- Regular staff training on data protection and security
- Incident response procedures and breach notification protocols
- Regular backup and disaster recovery testing
- Vendor security assessments and contractual safeguards

## 10.3 Ongoing Security

Security measures are regularly reviewed and updated to address emerging threats and technological developments.

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# 11. COOKIES AND TRACKING TECHNOLOGIES

## 11.1 Essential Cookies

The Platform uses essential cookies necessary for basic functionality:

- **Session Management:** User authentication and session maintenance
- **Security:** Cross-site request forgery protection
- **Preferences:** User interface preferences and settings

## 11.2 Analytics Cookies (If Implemented)

With appropriate consent, the Platform may implement:

- **Google Analytics:** Website usage statistics and performance metrics
- **Custom Analytics:** Platform-specific usage insights

## 11.3 Consent Management

Non-essential cookies are only deployed with explicit user consent through appropriate consent mechanisms.

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## **12. DATA PROTECTION IMPACT ASSESSMENT**

### **12.1 High-Risk Processing**

A Data Protection Impact Assessment (DPIA) has been conducted for this Platform, identifying and mitigating risks associated with processing medical professional data.

### **12.2 Risk Mitigation**

Identified risks have been addressed through appropriate technical and organizational measures, including enhanced security protocols and limited data collection practices.

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## **13. BREACH NOTIFICATION**

### **13.1 Incident Response**

In the event of a Personal Data breach, the Controller will:

- Assess the nature and severity of the breach
- Notify the ICO within 72 hours where required by Article 33 GDPR
- Notify affected Data Subjects where required by Article 34 GDPR
- Document the breach and response measures

### **13.2 Notification Criteria**

Data Subject notification will occur where the breach is likely to result in high risk to rights and freedoms.

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## **14. CHILDREN'S DATA**

### **14.1 Age Restrictions**

The Platform is intended for individuals aged 18 and over. Personal Data of individuals under 18 is not knowingly collected.

### **14.2 Parental Rights**

If Personal Data of a minor is inadvertently collected, parents or guardians may contact [support@medsearch.org.uk](mailto:support@medsearch.org.uk) for immediate deletion.

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## **15. CHANGES TO THIS PRIVACY POLICY**

### **15.1 Policy Updates**

This Privacy Policy may be updated to reflect changes in data processing practices, legal requirements, or Platform functionality.

### **15.2 Notification of Changes**

Material changes will be communicated through:

- Email notification to registered Users
- Prominent Platform notices
- Updated "Last Revised" date

### **15.3 Continued Use**

Continued use of the Platform following notification constitutes acceptance of updated terms.

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## **16. GOVERNING LAW AND JURISDICTION**

### **16.1 Applicable Law**

This Privacy Policy is governed by the laws of England and Wales.

### **16.2 Jurisdiction**

Any disputes arising from this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of England and Wales.

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## **17. CONTACT INFORMATION**

### **17.1 Data Protection Enquiries**

**Email:** [support@medsearch.org.uk](mailto:support@medsearch.org.uk)

**Subject Line:** "Data Protection Enquiry"

## 17.2 Supervisory Authority

### Information Commissioner's Office (ICO)

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

**Telephone:** 0303 123 1113

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### Site Administrator

MedSearch Beta Testing Platform

**Email:** [support@medsearch.org.uk](mailto:support@medsearch.org.uk)

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*This Privacy Policy is effective as of the date stated above and supersedes all previous versions. Regular reviews ensure continued compliance with applicable data protection legislation.*