

Privacy Policy

Overview

THIS PRIVACY POLICY DESCRIBES HOW PERSONAL DATA, INCLUDING MEDICAL INFORMATION ABOUT YOU, MAY BE USED AND DISCLOSED AND YOUR RIGHTS OF ACCESS TO THIS INFORMATION. PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY.

1. VSP UK: PRIVACY POLICY

VSP Vision Care – UK LTD (we, us, our or VSP UK) is the data controller for purposes of the UK Data Protection Act 1988 and will collect personal data about you when you use our website www.vsp-uk.co.uk (our site). This Privacy Policy tells you how we will use this information and how you may contact us if you have any queries. VSP UK will not use or disclose your personal data for purposes other than those described in this Privacy Policy.

2. SITE USERS

When we use the term "you" in this Privacy Policy, we are referring to any user of our site. We have broken out information about how we use your information by the type of user you are: Members: If you are a member or patient receiving vision care treatment and become a registered user of our site, we will collect personal data about you, such as your name, postal address, date of birth, gender, your employer's name, email address, your computer's ISP address, password, user ID, name and relationship of other persons who have membership benefits such as your partner or children (dependants). We may also collect sensitive personal data relating to your and your dependants' vision care diagnosis, treatment and health, claim information and your bank account details in order to process claim payments for products and medical services you have received. We may receive information about you from a partner or third party, such as your vision care provider ("VCP"). We may also ask you to complete market research surveys from time to time. Vision Care Providers: As a registered VCP user, we may collect personal data from you, including your name, practice name and address, details of the vision care services you provide to members, and language ability if you are capable of providing vision care in a language other than English. Corporate Client Portal User: As a registered user of our VSP Client Portal (client portal), we may collect personal data from you, including your name, the client company that you work for, work email address and chosen username and password. Non-registered users and visitors to our site can access the publicly available areas of our site without the need to login or provide any personal details. For these visitors, we will collect your computer's ISP address and set cookies in accordance with section 9 (Cookies) below.

3. YOUR LOGIN

When you register on our site, you will be assigned a Login. Your Login is how you access the non-public areas that contain information about you, your account and your relationship with us. Your Login may be displayed while you access the non-public sections of our site. Your information may be shared with our partners for the purposes of providing services to you.

4. USING OUR SITE

Each time you log in to our site, we will collect information automatically without further notice to you, for example:

- your Login
- your IP address (the unique numbers which identify the network and device you are using) and date and time of sign in;
- how you use the services, for example, what areas you access, what content you browse or download, what services you access and for how long or other communication services, including queries sent to us.

5. WHAT WE DO WITH YOUR INFORMATION

Members: As an individual member or patient receiving vision care treatment, we may process your personal data, liaise with and disclose information to your VCP in relation to the provision, coordination or management of your vision care treatment. We will also use your information for billing, claims processing and data entry in order to operate and provide the products and services that you have requested. We may also process sensitive personal data relating to your vision care treatment and health for payment processing and to verify that services provided were covered under your vision care plan.

Vision Care Practitioners: We will process your information in relation to the provision, coordination or management of vision care treatment of members and related services, quality assessment and improvement, performance evaluations, fraud and abuse detection, claim and payments audits and customer issue resolution. **All users:** We use information to maintain accounts, to deal with customer service requests and to carry out research and analysis to improve our products and services, and, as permitted by law, for marketing and promotional purposes.

From time to time, we will send users administration messages about our services (for example, if you lose your password or if changes are made to the terms of the services). We will also give you the option of receiving marketing information about new products, services and promotions. If you choose to receive such marketing information, we may also use and disclose your information to relevant third parties for this purpose, but we will only do so, where we have received your consent. In exceptional circumstances, we may use and/or disclose your information as required or permitted by law, regulation or order or to protect or defend ourselves.

6. WHO ELSE HAS ACCESS TO YOUR INFORMATION

Your information will be available to other VSP UK affiliated companies and to third parties who help us provide the services, including participating parties in the vision care programme(s). They will comply with this Privacy Policy and we will be responsible for their use of your information. [You may also use our site to access websites offered by other companies who are not part of the VSP UK affiliated company group. If you use your account to access these services, we will share your account details with those companies, so that they can provide services to you. We are not responsible for how these companies use your information. They may have their own privacy policies governing how they will use your information, which we encourage you to access and read before using any service supported by them. By using your user account details to access third party websites, you confirm that you want us to share your account details in this way.] Your information may be available to third parties during negotiations for a transfer of all or part of our business and may be transferred by us as part of that business.

7. TRANSFER OF YOUR INFORMATION OUTSIDE THE UK

As VSP Vision Care – UK LTD is a wholly-owned subsidiary of Vision Service Plan, a US not for profit corporation, that operates VSP UK's site and IT systems, your information will be processed for the purposes set out in this Privacy Policy, stored at and transferred to the United States. It may be processed by staff operating outside the United Kingdom who work for us or for one of our partners and may be seen by other users in that country. Data protection laws in the United States may not offer the same level of protection as in the United Kingdom. We will take all steps reasonably necessary to keep your information is treated securely and in accordance with this Privacy Policy.

8. CHANGING DETAILS AND UNSUBSCRIBE

If you want to change or update your registered user details, you can do so by contacting us at [VSP UK](#). If you want to opt-out of receiving marketing information and/or advertising, you can also do so by contacting us. We will aim to process your request as soon as reasonably practicable.

9. COOKIES

VSP UK collects information about users of our site through cookies. Cookies are small, alphanumeric identifiers that are transferred to a computer's hard drive through the user's web browser, which enables VSP UK's systems to recognize the browser and provide personalised features. We use cookies to store specific information about you and to track your access to and use of our site, including recognising your Login and password. Most browsers can be set to reject all cookies. The Help portion of the toolbar on most browsers will tell a user how to prevent the browser from accepting new cookies, provide notification if new cookies are received, or disable cookies altogether. However, where you select this setting you may be unable to access or use certain parts of our site. If you would like to know more about cookies, including flash cookies/local storage devices, the following websites provide useful information:

- www.allaboutcookies.org
- www.youronlinechoices.eu
- <http://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>

10. SECURITY

Appropriate technical and organisational security measures shall be taken to prevent unauthorised access to or disclosure of your information. Our site encrypts all communications between us and registered users using secured socket layer (SSL) technology. The security software used to protect your information is the industry standard and among the best software available today for secure transactions. You are responsible for keeping your password secret to prevent unauthorised access to and use of your account. We ask you not to share your password with anyone.

11. YOUR RIGHTS

You have the right to know what information we hold about you and how that information is used. You also have the right to ask us not to process your personal data for marketing purposes. If you would like to know what personal data we hold about you, please [contact us](#). Where you require access to information we hold about you, we will require you to put your request in writing and provide proof of identity. We will comply with all statutory time periods in responding to any requests. You also have the right to contact the UK Information Commissioner's Office in respect of any complaints in relation to this Privacy Policy or how your personal data has been used.

12. CHANGES TO THIS PRIVACY POLICY

Your use of our site is subject to this Privacy Policy and the Terms of Use. VSP UK reserves the right to amend this Privacy Policy and to make the revised Privacy Policy effective for all personal data that it maintains. If VSP UK revises this notice, we will make the revised notice available within sixty (60) days. Please check regularly to ensure that you are aware of any changes.

Dated November 2012