

September 2025

**Medidata Exchange Limited | Updates to privacy policy made on 27 August 2025**

We updated our privacy policy on 27 August 2025 and the updated policy can be found at [medi2data.com](https://medi2data.com) and at [medi2cert.co.uk](https://medi2cert.co.uk). The previous version of the privacy policy was dated 16 February 2024.

This document summarises the changes reflected in the updated privacy policy. Given the nature of this document as a summary, you should consult the full policy for details of your and our respective relevant rights and obligations.

By continuing to receive our services, you accept our updated privacy policy.

Description of change	Paragraph(s) of updated policy reflecting the change
The scope of the policy has been extended such that we now have one policy covering the activities of our medi2data and medi2cert businesses (it is available on the websites of both businesses at <a href="https://medi2data.com">medi2data.com</a> and <a href="https://medi2cert.com">medi2cert.com</a> ) and addressing how we collect, process, use and store personal information on a wider range of individuals including now additionally current and would-be employees and clients or ours and customers of clients of ours (for example those accessing our services through a portal we may operate for a client of ours).	Paragraphs 1 and 3
<p>The updated policy includes a description of how we may share personal data with our wholly-owned South African subsidiary, Medi2data (Pty.) Ltd. (of which details are provided), to assist us in serving our clients and customers of our clients, either as a data subprocessor of ours to assist in responding to data subject access requests or, where relevant, to produce curated medical reports, acting as a data controller.</p> <p>The updated policy describes how relevant activities will be subject to, and afford individuals protections under, South African data protection legislation (the South African Protection of Personal Information Act (POPIA) as well as the UK General Data Protection Regulation (GDPR). The updated policy includes details of the South African Information Regulator.</p>	Paragraphs 2.2, 3.2 and 10, 12 and 14

Description of change	Paragraph(s) of updated policy reflecting the change
<p>The updated policy describes our security policies and procedures for safeguarding your information and describes how we may transfer your information outside the UK. Your information is stored on our servers in the UK, but we may transfer it to the EU whose data protection regime is considered essentially equivalent to that in the UK.</p> <p>Where we carry out operations with assistance from within South Africa by Medi2data SA (Pty) Ltd, it may access your information held on servers in the UK or EU. This access may amount to an international data transfer under data protection law. We and Medi2data SA (Pty) Ltd have, therefore, entered into a data sharing agreement including standard contractual clauses under the UK Information Commissioner's Office standard international data transfer agreement. The agreement requires Medi2data SA (Pty) Ltd only to process your information obtained from us in support of our business and prevents transfer of your information from South Africa other than to us in the UK or EU. The agreement similarly protects information created by Medi2data SA (Pty) Ltd in South Africa (for example, a medical report created by Medi2data SA (Pty) Ltd).</p>	
<p>The updated policy includes additional items of personal information that we may collect, process, use and store (by any means including through our website, any portal we operate for a client or otherwise in writing), including (where relevant) NHS and insurance policy numbers, business addresses, employer and job title details, contact information for your doctor, other healthcare professional or other relevant service provider, checks on insurance claims and compliance databases (including those relating to international sanctions and criminal records), recruitment information if you are being considered for a job with medi2data, and dietary preferences if you are to attend an event of ours such as a promotional event to prospective clients of ours.</p>	Paragraph 3
<p>The updated report lists additional legal bases on which we may rely to, and additional instances in which we may, use and in certain cases share your personal information. We</p>	Paragraphs 5 and 8

Description of change	Paragraph(s) of updated policy reflecting the change
<p>may now also use your information and where relevant share it with applicable third parties, as relevant: to provide services in respect of you to a client of ours of whom you are a customer and to liaise with your doctor or other healthcare professionals; to recruit and employ people (carrying out background checks and using personal information to carry out employment benefit-related administrative tasks); to comply with our legal and other contractual obligations (including our obligations to comply with requirements imposed on us by HMRC, the UK Information Commissioner's Office or any other regulator, and our obligations towards the prevention of fraud, terrorism, terrorism financing, money laundering, identity theft and cyber crime); to inform you of changes to our website, portal or other service terms; to investigate and address comments, queries and complaints regarding our services; to pursue our legitimate interests including to analyse how our services are used and to improve them (and we may provide your information in an anonymised form (without identifying you) to purchasers of insights gained from our business); to engage third party IT system suppliers of ours who may need some level of access for technical purposes in connection with the operation of systems; and to finance, legal and regulatory professionals who may need information to assist us with otherwise permitted activities.</p> <p>The use we may make of your information is subject in all cases to our not overriding your rights and freedoms under applicable data protection law as described in paragraph 12 of the policy.</p> <p>We have provided additional wording to note that, where we hold personal information on you for an initial purpose, we may not use it for an additional non-permitted purpose without your consent.</p>	
<p>We have added that we may require you to supply evidence of your identity if you notify us that you wish to exercise your rights under data protection and we have included details of how you may contact us or, for example if correspondence and/or discussions between you and us do not resolve a</p>	<p>Paragraph 14</p>

Description of change	Paragraph(s) of updated policy reflecting the change
concern you may raise with us, the UK Information Commissioner's Office and / or South African Information Regulator.	