

## Privacy and Data Note

### Who We Are

FM Doctor is the trading name of Craig Bromyard, a sole trader providing advisory and document-based services relating to AI readiness, AI governance, workflow, operational documentation, and related decision-support advisory services.

Contact: [hello@fmdoctor.co.uk](mailto:hello@fmdoctor.co.uk)

FM Doctor is registered with the UK Information Commissioner's Office. ICO reference: ZC092109.

### What Personal Data We Process

FM Doctor processes only personal data necessary to deliver services or meet legal obligations. This may include:

- names, job titles, organisations, and contact details
- project communications, files, and materials provided by clients
- deliverables and working documents
- invoicing and payment records

FMD does not require patient-identifiable information for standard AI readiness, governance, workflow, or operational advisory services.

Please do not send patient-identifiable information, special-category personal data, safeguarding information, staff health or sickness information, HR-sensitive information, passwords, credentials, or highly restricted information unless this has been explicitly agreed in writing before transfer.

Where you use an enquiry form, AI-assisted enquiry tool, free-resource download form, or similar workflow, the information you submit will be used to respond to your enquiry, provide the requested resource, assess fit, and manage follow-up where appropriate.

Form responses are used only to scope, assess, deliver, and support services or requested resources, and to manage related enquiries.

### Why We Process Personal Data

Lawful bases listed in the source:

- contract
- legal obligation
- legitimate interests

FM Doctor acts as data controller for its own business purposes, including enquiries, contracting, invoicing, record-keeping, and compliance obligations.

Where FM Doctor processes personal data provided by a client solely to deliver the services and under the client's instructions, FM Doctor acts as data processor and the client acts as data controller.

Where FMD acts as processor, processing is governed by the FMD Data Processing Addendum unless equivalent written processor terms are agreed.

### Use of AI-Assisted Tools

FM Doctor may use approved AI-assisted tools to support drafting, structuring, analysis, quality review, and administration.

AI tools are not used to make automated decisions about individuals, and FM Doctor does not provide automated decision-making or profiling as part of its services.

FMD does not input patient-identifiable information, special-category personal data, safeguarding information, staff health or sickness information, passwords, credentials, or unnecessary confidential client information into public AI tools.

Client confidential information may only be used with AI-assisted tools where separately agreed in writing. This agreement may be recorded in the Statement of Work, written scope confirmation, email confirmation, or another written instruction agreed by both parties.

Where AI-assisted outputs may later be used by a client in a process affecting service users, staff, patients, tenants, applicants, or other individuals, the client remains responsible for providing appropriate transparency, human review, routes to challenge or request human intervention, and any non-AI alternative required by law, policy, or sector guidance.

## How Long We Keep Data

- project files and communications are retained for up to 12 months after completion unless needed for support, disputes, or legal reasons
- financial and tax records are retained longer where legally required, typically up to 6 years
- enquiries and related correspondence are retained for up to 12 months unless a longer period is needed for relationship management, dispute handling, or legal reasons
- contracts, invoices, and financial records are normally retained for up to 6 years where required for tax, accounting, or legal reasons
- personal data breach records are normally retained for up to 6 years for accountability and regulatory reasons
- free-resource download details and related follow-up records are retained only for proportionate record-keeping, follow-up, and service administration, unless deletion is requested where applicable

## How Data Is Protected

Appropriate technical and organisational security measures are used to protect personal data against unauthorised access, loss, or misuse.

## Sharing and Transfers

Personal data is not sold. Data is shared only where necessary to deliver services or meet legal obligations, and may be processed using third-party services, some of which operate outside the UK, with appropriate safeguards in place.

Personal data may be processed using website hosting, security, form, email, analytics, and cloud service providers, including Cloudflare and Microsoft services where used.

Personal data may be processed using a limited number of third-party services needed to operate FMD, including Apple Mail, iCloud Drive, iCloud backup, ChatGPT, Cloudflare, website hosting, form tools, email services, and related cloud services where used.

FMD seeks to use reputable providers and appropriate service terms, security controls, and transfer safeguards where relevant.

## Your Rights

Individuals have rights under UK GDPR, including the right to access, correct, or delete personal data, and to object to or restrict processing where applicable.

## Complaints

If there are concerns about how personal data is handled, contact FM Doctor first at [hello@fmdoctor.co.uk](mailto:hello@fmdoctor.co.uk). Individuals also have the right to complain to the UK Information Commissioner's Office.

## Note

This document is provided for transparency. More detailed information about data handling and security is available on request.