Version 1.5 – October 2026

Bookable Navigator: Patient Privacy Notice

1. What is Bookable Navigator and who is Healthtech-1?

We're Healthtech 1 Limited ("we", "us", and "our") and we operate under the name Healthtech-1.

We're registered with the United Kingdom ('UK') data protection authority (the Information Commissioner's Office or 'ICO') under number ZB208155.

We make technology for the NHS. We're a group of NHS staff, doctors, operators, and engineers based in a GP practice in East London. GP practices pay for our technology and as of December 2025, we support 24% of England's GP practices.

We own and operate Bookable Navigator. It's a platform where patients can submit health or administrative requests to their GP practice (commonly known as 'online consultations'). As well as that, Bookable Navigator helps navigate patients to the best place for their care (like suggesting an appointment with a nurse or doctor at the GP practice, or recommend a visit to a local pharmacy or dentist).

Using Bookable Navigator does not affect your rights to access NHS care and you can always ensure that your request is sent to your GP practice.

When you use Bookable Navigator: Healthtech-1 is the Data Processor and the GP Practice is the Data Controller. Once you submit your request to your GP practice or book an appointment with the GP practice, Healthtech-1 acts as a data processor on behalf of the relevant GP practice who is the data controller. There is one exception to this, which is that Healthtech-1 is the Data Controller so far as is needed to maintain the service's Medical Device classification.

This notice explains how your information is used when you contact your GP practice through Bookable Navigator. You do not need to take any action for this processing to apply.

If you'd prefer not to use Bookable Navigator, you can contact your GP practice directly by phone instead.

2. Getting in touch

If you have questions, you can contact us at support@healthtech1.uk. Our team will be happy to direct your message to the best person, including our Data Protection Officer.

Alternatively, you can write to us at Healthtech-1, 91 Belmont Hill, London, SE13 5AX.

If you would like to make a complaint about how we use your personal information, you should email us or write to us and we'll do our best to fix the problem.

If you're still not happy, you can refer your complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues. For more details, visit their website.

3. Your rights

You have a right to:

- access the personal data we hold about you, or to get a copy of it;
- ask for a copy of your personal data in a portable (machine-readable) format or make us send it to someone else;
- ask us to correct inaccurate data;
- ask us to delete your data, though for legal reasons we might not always be able to do it;
- object to us using your data for direct marketing and where your data is processed on the basis of 'legitimate interests', or for research and statistical reasons;
- withdraw any consent you've given us at any time but this does not make prior processing based on consent invalid;
- restrict processing of your data;
- complain to the Information Commissioner's Office. We ask that you first contact us to give us an opportunity to address any concerns; and
- ask us to review an automated decision.

To do any of these things, please get in touch using the details above. We will usually require you to confirm your identity (or evidence the right you have to access someone else's data) before disclosing personal data.

4. Changes to this notice

We'll update the privacy notice from time to time. The latest version will be accessible in the footer of Bookable Navigator.

If we make significant changes to how we use your personal information, we'll take appropriate steps to let you know.

5. The legal bits

Healthtech-1 collects information when you use Bookable Navigator.

Some of this information does not directly identify you, and some of it does. Even where information does not directly identify you, it may still be treated as personal data under data protection law, and we take steps to reduce how identifiable it is.

You can begin to use Bookable Navigator without being directly identified until you choose to enter your personal details to make your request to your GP practice. Once you do this, the information you provide can be linked to you.

The information we hold about you, and how we use it	Information that cannot be used to directly identify you ● Free text response to 'Describe your symptoms' and 'We need a bit more information' (see Appendix B to find out how we use Artificial Intelligence). ● If you accept them, we also use cookies. For information about what cookies are and how we use them, please see Appendix A. Information that can be used to identify you ● First name. ● Last name. ● Date of birth. ● Sex at birth. ● Postcode. ● Phone. ● Email. ● NHS number (confirmed against NHS records). ● Free text response to 'Tell us why these options were not right for you' (see Appendix B to find out how we use Artificial Intelligence). ● Images you attach. We use non-identifiable information to measure how people use the service, and to support when improving the website. We use identifiable data to recommend the best place to access care, and to process your request, including checking your name, date of birth and NHS number against NHS records (the NHS Personal Demographics Service) to confirm your identity and match you to the right patient record. This data is used to help your GP practices contact you about your request, identify you and your medical records, and respond to your request.

	We use AI (see Appendix B) to categorise the free text response to ‘Describe your symptoms’ and to give your request an advisory urgency rating, to help your GP practice's staff prioritise their review. These categories are stored indefinitely but do not contain the raw information that you enter.

Our reasons for using your information	Data protection law says we must have a lawful reason for using your personal information. Public task When you use Bookable Navigator to: ● find the right place for your care and, in some cases, book an appointment with your GP practice; or ● submit a request to your GP practice your information is used to support the delivery and management of NHS services. GP practices and NHS England have a legal duty to provide access to healthcare services, and Bookable Navigator is used to help them carry out this task. In these cases, we process your information on behalf of GP practices to provide care navigation suggestions, book appointments, and process requests for health or administrative queries (also known as 'online consultations'). Legal obligation We may use your information where required to do so by law, including to: ● keep appropriate records; ● meet regulatory, audit, or reporting requirements; and ● protect patient safety and service integrity. Legitimate interests We use some information to run, protect, and improve the Bookable Navigator service. This includes: ● communicating with you about the progress of your request and/or booking, and for post-request feedback;

	● understanding how people use the website; ● improving performance and reliability; ● maintaining security and preventing misuse; and ● supporting product development and service planning (we may contact you to discuss your experience using Bookable Navigator). We only rely on legitimate interests where this use does not override your rights, and we do not use legitimate interests to deliver core NHS care or make decisions about your treatment. Special category data Some of the information you provide relates to your health. This is known as 'special category data'. We process this information only where necessary to support healthcare services, under the healthcare and health system management condition in data protection law.

Who we share your data with	Information that cannot be used to directly identify you ● Other health providers or for research use (anonymous) Information that can be used to identify you ● Healthtech-1's sub-processors (see Appendix A) ● NHS England's Personal Demographics Service (PDS), to confirm your identity and NHS number ● The relevant GP practice's clinical or online consultation system (such as Accurx), where it is processed under the GP practice's privacy notice. If you use NHS login to login, please see Appendix E.
Where we store your information	Information that cannot be used to directly identify you When using Bookable Navigator, information is stored within the UK. If you accept cookies, some of this non-identifiable information is processed outside of the UK (see Appendix A). Information that can be used to identify you When you submit your request through Bookable Navigator, information is stored within the UK (see Appendix A).

How long we keep your information	Information that cannot be used to directly identify you We store this information indefinitely, until we no longer need it or you ask us to stop. Information that can be used to identify you We store your identifiable information for up to 2 years from when we first process it. This is because the information collected through the Bookable Navigator process is used to ensure that requests made by patients are actioned by GP practices and that, where the request forms part of decisions about care, it can be stored long enough to be relied upon. Images uploaded during a request are usually deleted once they've been successfully transferred to your GP practice's clinical or online consultation system, and in any event within the 2-year period described above. Note: To work out how long we should keep your data, we consider why we hold it, how sensitive it is, how long the law says we need to keep it for, and what the risks are.

APPENDIX A: Sub-processors and cookies

Sub-processors

We use the following sub-processors to deliver the Bookable Navigator service:

Name	Description	Location	GDPR Compliance
Microsoft Azure	Healthtech-1 controls access to the infrastructure that we use to store and process the data on the platform. We use Microsoft Azure's secure cloud hosting service to securely store and process patient data. We also use Microsoft Azure to host our local AI models which allow Bookable's AI Care Navigation to categorise requests and future training. The Azure regions used are exclusively located in the UK, for both live, test and backup environments. This mirrors the way NHS England stores its data with Microsoft.	UK 🇬🇧	Yes as standard.

Vercel	Vercel is a GDPR assured, globally distributed network used to host the Healthtech-1 registration form and Hub. The network uses servers located close to the end user to serve content to the user with low latency regardless of their geographic location.	Multi (UK 🇬🇧 / EEA 🇪🇺/ US 🇺🇸) as Vercel may route traffic through servers dynamically based in any one of these regions in order to maintain a consistent, low-latency system.	Yes with a Data Processing Agreement.
Posthog	PostHog is used to understand how people use the Bookable Navigator website. It helps us see which pages are used, how users move through the service, and where improvements can be made. We use PostHog to support product development, service monitoring, and performance analysis. We configure PostHog to scrub and minimise the data collected so it cannot be used to identify individuals.	UK 🇬🇧 / EEA 🇪🇺 (PostHog is configured to use EU/UK-hosted data centres).	Yes with a Data Processing Agreement. (PostHog is GDPR compliant and supports data minimisation and IP anonymisation).

Sentry	Sentry is used to monitor the reliability and security of the Bookable Navigator service. It helps us detect, diagnose, and fix technical errors so that the service runs safely and smoothly. Sentry may collect limited technical information (such as error logs and device or browser information) to help identify and resolve issues. It is not used to profile users or make decisions about care.	EEA 🇪🇺 / US 🇺🇸 (Sentry may process technical data outside the UK/EEA).	Yes with a Data Processing Agreement and appropriate international transfer safeguards. Sentry uses approved contractual safeguards to protect personal data.
Firetext	Healthtech-1 sends SMS messages to patients. We use third party gateways for the delivery of those SMS messages. They provide APIs that the Healthtech-1 server uses to send these messages.	UK 🇬🇧	Yes as standard.
QuickSMS	Healthtech-1 sends RCS (Rich Communication Services) messages to patients. We use QuickSMS as a third party gateway for the delivery of those RCS messages. They provide APIs that the Healthtech-1 server uses to send these messages.	UK 🇬🇧	Yes as standard.

Customer.io	Customer.io is an email campaign service provider used within Healthtech-1 to communicate with Patients on behalf of practices.	EEA 🇪🇺 (Belgium 🇧🇪)	Yes through a Data Processing Agreement.
Google Cloud	Google Cloud provides access to frontier AI models with data processing in the EU (they do not store data except while it is being processed).	EEA 🇪🇺	Yes

We only use sub-processors where appropriate safeguards are in place to protect personal data.

Cookies
If you accept them, we use the following cookies on Bookable Navigator to support product development, user research, and business decisions about the service:

- Meta Ads
- Google Tag Manager and Google Ads
- Google Analytics

No information that directly identifies you is processed or stored by these cookie providers, and no information about your health, symptoms, or GP request is made available to them. You can read our Cookie Notice for more information.

APPENDIX B: Artificial Intelligence

We use artificial intelligence (‘AI’) to provide the Bookable Navigator service and to help us achieve the purposes for processing your personal data described in this notice.

For the avoidance of doubt, AI will be used to categorise the free text response to ‘Describe your symptoms’ and to ask you personalised questions. AI is also used in a staff-facing Inbox to summarise and rank urgency; this speeds up the decision making for staff. These categories are stored indefinitely but do not contain the raw information that you enter.

If we use AI to process your personal data for any new purposes, we’ll either update this notice or tell you separately that we are doing so.

Examples of how we use AI include things like navigating you to the recommended healthcare provider, service, or professional, (by categorising your request using AI) or helping make business decisions.

The AI also gives your request an advisory urgency rating, to help your GP practice's staff prioritise their review. The AI only advises and supports clinical decision-making: it doesn't reject, close or action any request, and every request is reviewed and actioned by your GP practice's own staff.

We may also use your data to train and analyse the performance of our AI. We’ll only do this if it’s not possible to anonymise your data. We don’t allow third parties whose AI systems or models we use to use your personal data for their own training purposes.

APPENDIX C: Messages about bookings and requests

Using the contact details you provided during your visit to Bookable Navigator, you be may contacted by:

- email; and
- text message (SMS).

These messages are service messages, not marketing. They are used by Healthtech-1 and by GP practices to confirm details about appointment bookings and requests made. They are not used to advertise products or services. As such, there is no way to opt out.

APPENDIX D: Automated decision-making and profiling

Bookable Navigator uses automated processes to help recommend appropriate services. These tools do not make decisions that have legal or similarly significant effects on you. Final decisions about your care and appointments are made by healthcare professionals or GP practices. You can always ensure your request is received by your GP practice.

APPENDIX E: NHS login

Please note that if you access our service using your NHS login details, the identity verification services are managed by NHS England.

NHS England is the Controller for any personal information you provided to NHS England to get an NHS login account and verify your identity, and uses that personal information solely for that single purpose.

For this personal information, our role is a Processor only and we must act under the instructions provided by NHS England (as the Controller) when verifying your identity.

To see NHS login's Privacy Notice and Terms and Conditions, please click here. This restriction does not apply to the personal information you provide to us separately.

Version Control

Version	Approved
1	February 2026
1.1	June 2026: To add information about NHS login and update the product name to ‘Bookable Navigator’.
1.2	June 2026: To add information about Google Cloud as a sub-processor.
1.3	July 2026: Updated retention periods; added NHS number, date of birth, and sex at birth to the identifiable data we collect; added detail on NHS Personal Demographics Service (PDS) checks and the AI's advisory urgency rating.
1.4	July 2026: Reworded the introductory page line to reflect that consent is not the legal basis for processing data.
1.5	October 2026: Addition of QuickSMS to the sub-processors table.
1.6	Clarification of Healthtech-1 as a processor of Bookable Navigator.

If you have questions, you can contact us at support@healthtech1.uk. Our team will be happy to direct your message to the best person, including our Data Protection Officer.

Alternatively, you can write to us at Healthtech-1, 91 Belmont Hill, London, SE13 5AX.