BrightNest Medical

Address: 24A/25 Hill Street. Dublin 1

Phone: 0874657974/ 01-5589094

Email: info@brightnest.ie

Privacy Policy

Entity	BrightNest Medical
Jurisdiction	Ireland
Version	1.0
Effective date	September 2026

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1. Purpose and scope

This Privacy Policy explains how BrightNest Medical collects and uses personal data when a parent or legal guardian uses the BrightNest website to arrange a healthcare appointment for a child. It applies to the booking and administrative functions operated by BrightNest. It does not govern clinical records created by a treating healthcare professional.

2. Who we are

BrightNest Medical is the trading name of Ikechukwu Okafor Limited. For personal data collected by BrightNest Medical through the booking service, BrightNest Medical is the data controller.

Contact details:

- Privacy email: info@brightnest.ie
- General email: admin@brightnest.ie
- Telephone: +353874657974
- Registered address: 1 Hazelbury Green, Clonee. Dublin 15.

3. What BrightNest does

BrightNest Medical enables parents and legal guardians to book appointments for children with independent healthcare professionals and/or phlebotomists. Services may include blood collection, consultant clinics, general practitioners, physiotherapy and other therapies (health and social care professionals).

BrightNest Medical does not provide an electronic medical record through the website. Clinical information generated before, during or after an appointment is maintained by the treating healthcare professional in that professional's own medical record system.

4. Personal data we collect

For an appointment booking, BrightNest Medical currently collects:

- The parent or legal guardian's name
- The parent or legal guardian's telephone number
- The parent or legal guardian's email address
- The child's full name
- The child's date of birth

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- The type of appointment
- The date and time of the appointment
- The referring doctor's name and practice
- Confirmation that a signed investigations form exists
- Payment and refund status
- The booking reference number
- The parent's acceptance of the consent form, with time and version

BrightNest Medical should collect no more information than is reasonably necessary to arrange and administer the appointment.

5. Information we do not collect through the booking service

Parents cannot upload documents through the booking form. BrightNest does not use the website to collect or store clinical notes, diagnoses, prescriptions, referral letters, medical reports, laboratory results, imaging records or a child's general medical history.

Parents should not include detailed medical or other confidential health information in any free-text booking field. Where clinical information is required, it should be provided directly to the treating healthcare professional using the clinician's approved process.

6. Why we use personal data

- to create, manage and administer appointments;
- to identify the child and parent or legal guardian associated with a booking;
- to make the booking available to the relevant healthcare professional through the secure booking portal;
- to communicate about a booking where necessary;
- to process or reconcile payments and refunds, where applicable;
- to maintain appropriate business and financial records;
- to protect the security and integrity of the website and booking service; and
- to comply with legal obligations and establish, exercise or defend legal claims.

7. Lawful bases

For ordinary personal data, BrightNest Medical relies principally on Article 6(1)(b) GDPR where processing is necessary to take steps at the parent's request or to administer the booking service. BrightNest may also rely on Article 6(1)(c) where processing is required

by law and Article 6(1)(f) where processing is necessary for a legitimate interest, such as security, fraud prevention, record-keeping or the defense of legal claims, provided those interests are not overridden by the rights of the individual.

The type of appointment may reveal or imply information concerning a child's health and may therefore constitute special category of personal data. BrightNest Medical will process any such information only where an additional condition under Article 9 GDPR applies.

8. Children's data

BrightNest Medical's services concern children and their personal data merits particular protection. Appointments through the website are to be made by a parent or legal guardian acting for the child. BrightNest Medical applies data-minimization, restricted access and appropriate security measures to the child's booking information.

A child's data protection rights belong to the child. Where a parent or guardian seeks to exercise a right on a child's behalf, BrightNest Medical may take reasonable steps to verify identity, authority and, where appropriate, the child's own interests and level of understanding.

9. Healthcare professionals and clinical records

Healthcare professionals engaged through BrightNest Medical are independent contractors. They receive the booking information necessary to provide the appointment through a secure portal.

Clinical records are created and retained by the treating healthcare professionals through a separate medical portal owned or controlled by that professional. BrightNest Medical does not routinely access or control those clinical records as part of the website booking service.

10. Payments

Online payments are processed via Stripe. BrightNest does not store full payment card details. Stripe processes payment information under its own privacy and security arrangements. Where payment is made at the clinic, the relevant payment process will apply at that location.

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11. Service providers

BrightNest Medical uses third-party providers to operate the service. Current providers include Vercel for website hosting, Microsoft 365 for business communications and administration, Stripe for online payments, Resend for email confirmations, and Supabase for the database. BrightNest Medical will keep its list of processors and other recipients under review and will put appropriate contractual arrangements in place where required by GDPR.

12. International transfers

Some service providers may process personal data outside the European Economic Area. Where a restricted transfer occurs, BrightNest Medical will ensure that a lawful transfer mechanism and any required supplementary safeguards are in place, such as an adequacy decision or the European Commission's Standard Contractual Clauses.

13. How long we keep data

BrightNest keeps personal data only for as long as it is reasonably necessary for the purpose for which it was collected, taking account of legal, accounting, dispute-resolution and security requirements.

As a working retention position, completed and cancelled appointment booking records will be retained for two years after the appointment or cancellation date and then securely deleted or anonymized, unless a longer period is required by law or reasonably necessary for a live complaint, dispute or legal claim. Financial and accounting records will be retained for the period required under applicable Irish law. Clinical records are retained by the treating healthcare professionals, not by BrightNest Medical.

The detailed retention periods are set out in BrightNest Medical’s Data Retention Schedule.

14. Security

BrightNest Medical will implement appropriate technical and organizational measures proportionate to the nature of the data and the risks involved. These measures should include secure HTTPS connections, access controls, strong authentication for administrative access, least privileged access, appropriate logging, secure

configuration, patching and backup arrangements, and confidentiality obligations for persons with access to personal data.

15. Your data protection rights

Subject to the GDPR and applicable law, individuals may have the right to:

- obtain information about how their personal data is used;
- access personal data;
- correct inaccurate or incomplete personal data;
- request erasure where the legal conditions are met;
- request restriction of processing;
- object to processing based on legitimate interests;
- receive certain personal data in a portable format where the right applies;
- withdraw consent where processing is based on consent, without affecting earlier lawful processing; and
- complain to the Data Protection Commission.

Requests should be sent to info@brightnest.ie. BrightNest Medical may request information necessary to verify identity and authority before acting on a request.

16. Marketing

BrightNest Medical does not currently use booking information to send marketing emails or newsletters. If this changes, the Privacy Policy and consent arrangements will be updated before marketing begins.

17. Data breaches

BrightNest maintains procedures for identifying, assessing and responding to personal data breaches. Where required by GDPR, BrightNest will notify the Data Protection Commission within the applicable statutory timeframe and will inform affected individuals where the breach is likely to result in a high risk to their rights and freedoms.

18. Complaints

If you have a concern about BrightNest Medical's use of personal data, please contact info@brightnest.ie first so that the matter can be considered. You also have the right to lodge a complaint with the Data Protection Commission in Ireland.

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19. Changes to this Privacy Policy

BrightNest may update this Privacy Policy to reflect changes in law, technology or the operation of the service. The current version and effective date will be published on the website.