

<b>Reference:</b>	FOI.18982.25
<b>Subject:</b>	Virtus Tech
<b>Date of Request:</b>	28 November 2025

**Requested:**

Please provide the following records held by your organisation regarding use of the Virtus Tech Ltd platform:

1. The current contract or licence with Virtus Tech Ltd, including data protection terms and schedules. If you withhold the document in full or in part, provide the clause numbers and headings for change of control, termination, data export and deletion, and data use by the supplier, plus the signature or approval date.
2. The DPA or schedule that sets controller and processor roles, processing purposes, categories of personal data, sub processors, retention, and deletion.
3. The Data Protection Impact Assessment for Virtus Tech Ltd. If withheld, provide the document title, version, approval date, and recorded residual risk rating.
4. Any recorded statement that shows the hosting location for staff data and any international transfer mechanism used for Virtus Tech Ltd.
5. Any recorded clause, policy, or decision that confirms Virtus Tech Ltd has no right to use staff personal data for product development, analytics, model training, marketing, or sharing with third parties such as pharmaceutical companies beyond providing the service to you.
6. Any recorded paper or decision that addresses the use of charitable or public funds in connection with Virtus Tech Ltd and how public benefit is protected.
7. Please confirm whether you have granted any permission to Virtus Tech Ltd to use your name or logo on its website or in marketing and what your relationship with Virtus Tech Ltd is. If no permission has been granted, please confirm that you will request removal and provide the expected timescale for removal.

**Response:**

Hywel Dda University Health Board regrets to inform you that it does not hold the information requested, as it has not used the Virtus Tech Ltd platform.