

## PRIVACY NOTICE

This Notice explains how your personal information is processed by the Clinimed companies listed in the Data Controllers and Contact section below. When we use the terms “we”, “us”, and “our” in this document, we are referring to those companies. This Notice also tells you how you can access and update your personal data and make certain choices about how your personal information is used. Please read this Notice carefully to understand our policies and practices regarding your personal information and how we will treat it.

### Scope of our Privacy Notice

This Privacy Notice applies to anyone who interacts with us about our products and services (“you”, “your”), in any way – for example, through our website, by telephone or in person.

Please note that we may combine personal information that we collect via one method (e.g. Clinimed website) with personal information we collect via another method (e.g. Customer service helpline). As part of this, we may combine personal data that were originally collected by different Clinimed entities. More information about these activities is set out below.

If we change the way we handle your personal information, we will update this Notice. We reserve the right to make changes to our practices and this Notice at any time. The amended Notice will be posted on the relevant website. Please check back regularly for any updates or changes to this Notice.

This Notice may be supplemented by additional notices in connection with some of our specific services (e.g. Securicare nursing service or services offered to healthcare professionals).

### How we collect information about you

We may obtain personal information from or about you from various online and offline sources such as the personal information you provide whilst interacting with our websites, customer services (including by call recording), at patient meetings and open days or social media pages, forums or blogs. This will usually be

information you provide yourself, but we may also collect information from your parent or guardian if you are under 18, a family member or someone else on your behalf, and health care professionals.

Where you provide us with information about other people, you must make sure that they have seen a copy of this privacy notice and are comfortable with you giving us their information.

### **What types of personal information we may hold about you**

The personal information will include your name, address, date of birth, gender, contact details (including email address), (which we refer to as “basic data”); the health-related information you have given us and information about your race, ethnicity, and religion, if we need to do so to provide care that is tailored to your needs (all of which is “special categories” data). We are also holding records of contact we have had with you such as product samples, services, and advice we have provided.

If you use any of our websites, we may also automatically collect technical information including your device’s IP address; and information about your visit, including the URL clickstream to, through and from our websites; products you viewed or searched for, the content that you view or interact with, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. Some of this information is collected using cookies and related technologies. For further information on this, please see our Cookies Policy: <https://www.clinimed.co.uk/Cookies.aspx>

### **What we use your personal information for and our lawful basis for processing**

When we collect, and in any way use your personal information, we must have a “lawful basis” to do so.

Where we have the appropriate lawful basis to do so, we will use the information you have given us to:

- process any orders you send us;
- handle any other requests or queries you have at any time;
- contact you to remind you to place orders or inform you about holiday opening times;
- contact you (by phone, email, or post) with information about relevant news, products and services which may interest you and occasionally, for customer satisfaction survey and research purposes; and
- review staff training requirements to maintain high quality service levels.

We will process your personal information when it is in our **legitimate interests** to do so and when these interests are not overridden by your data protection rights. For example, we have a legitimate interest in ensuring that our websites operate securely and effectively; and to understand our customers and to raise awareness of our products and services through appropriate advertising and marketing materials.

We will only process health information about your condition with your **explicit consent** or where this is **necessary to provide healthcare or treatment as permitted by law or pursuant to a contract** with a health professional. Where we rely on consent, you may withdraw your consent at any time by using the Contact details below, or unsubscribing or opting out following the instructions on any item we send you by post or electronically

When you telephone our customer service line, or they call you, your call may be recorded for training and quality purposes. We will ensure that you are made aware when calls are being recorded.

We will also process your personal information in order to **comply with applicable laws** and protect our legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, and regulatory purposes.

## **Disclosures, storage and transfers of your personal information**

We will share your contact details with courier or delivery companies in order to deliver your products, or when necessary, with health and social care professionals. We assure you, your personal information will not be passed on to any third parties for marketing purposes without your consent.

Your personal information is held securely on databases within the UK and is not transferred outside of the United Kingdom.

## **Your privacy rights**

### **Access to your personal information**

You can request a copy of your personal information that we hold, including what information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge by contacting us by one of the methods shown in the Contact section below

### **Right to withdraw consent**

If you have given us your consent to use personal information, you can withdraw your consent at any time and update your marketing preferences by contacting us as shown in the Contact section below.

### **Rectification**

You can ask us to change or complete any inaccurate or incomplete personal information we hold about you.

### **Erasure**

You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or if we have no lawful basis for keeping it.

### **Portability**

You can ask us to provide you or a third party with some of the personal information we hold about you in a structured, commonly used and electronic format so that it can be easily transferred.

### **Restriction**

You can ask us to restrict the personal information we use about you while we are responding to a request from you to correct or erase it, or you have objected to our use of it.

## **Your choices about how we use and disclose your personal information**

**Cookies:** If you wish to opt out of any cookies or other technologies we use on our websites, please see our Cookie Policy.

**Contracts:** Where we require personal information to comply with a legal or contractual obligation, then provision of such information is mandatory: if such data is not provided, then we will not be able to meet the obligations placed on us. In all other cases, provision of requested data is your choice.

## **Security of your personal information**

SecuriCare and CliniMed take your privacy very seriously. Our teams are all trained in Information Security matters and we strive to keep all our systems and buildings secure. We are continually working to meet the highest standard of security possible.

## **Retention of your personal information**

Your personal information will be retained for as long as necessary to fulfil the purposes outlined in this notice or to comply with applicable legal requirements.. Call recordings are in general, automatically deleted

after 30 days and will only be retained for longer than this in specific circumstances for good and justifiable reason.

## Data Controllers and Contact

For further information about this Policy or privacy matters generally, please contact: Group Director of Legal Services, Clinimed Group, Liston Exchange, Cromwell Gardens, Marlow Bucks SL7 1BG Tel: 01628 402380 [privacy@clinimed.co.uk](mailto:privacy@clinimed.co.uk)

We hope we can satisfy questions you may have about the way we process your personal information. If you have unresolved concerns, you also have the right to complain to the Information Commissioner's Office:

[www.ico.org.uk](http://www.ico.org.uk)

Data Controllers	Responsible for
<p>Clinimed Limited (“Clinimed”)</p> <p>Cavell House, Knaves Beech Way, Loudwater, High Wycombe Bucks HP10 9QY</p> <p><a href="mailto:privacy@clinimed.co.uk">privacy@clinimed.co.uk</a></p> <p>ICO Registration: Z5663262X</p>	<p>Provision of ostomy, wound care and continence and urology appliances and accessories.</p>
<p>Securicare (Medical) Limited (“SecuriCare”)</p> <p>Cavell House, Knaves Beech Way, Loudwater, High Wycombe Bucks HP10 9QY</p> <p>DATA PROTECTION OFFICER: Suzanne Bryden <a href="mailto:privacy@securicaremedical.co.uk">privacy@securicaremedical.co.uk</a></p> <p>ICO Registration: Z7130390</p>	<p>Home delivery service, delivering medical supplies direct to patients’ homes.</p>

**THIS NOTICE CAN BE PROVIDED IN LARGE PRINT, AND TRANSLATED AS NECESSARY ON REQUEST**