



PRIVACY NOTICE

(for customers)

Accordia Healthcare respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about our policy and how we look after your personal data and tell you about your privacy rights and how the law protects you.

Accordia Healthcare Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We have appointed a Senior Information Risk Owner (SIRO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the SIRO using the details set out below.

Contact details

Senior Information Risk Owner:

Email address: data-protection@accordiahealthcare.co.uk

Postal address: 22 St Andrews Street, London, EC4A 3AG

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to address your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where your identity has been removed (anonymous data).

We may collect, use, and store different kinds of personal data about you for the purposes of keeping you informed about our services. This may be as follows:

- **Identity Data** includes first name, last name, title.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Transaction Data** includes the services you use within Accordia Healthcare
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties, such as database providers (subject to such companies complying with the GDPR), healthcare organisations or providers of services and public sources (such as Companies House or information on public websites).

2. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to notify you of matters which relate to the performance of any contract we may have with your organisation.
- Where we need to keep you updated on service development, service change and new provision.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us on the details given above.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data, where more than one ground has been set out in the table below.

Purpose/ Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and to respond to regulators and government agencies	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

Relationship marketing

We may use your Identity and Contact Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant to you (we call this relationship marketing).

You will receive marketing communications from us if you have requested information from us, or your organisation purchases services from us, or if you provided us with your details when you entered a competition and, in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any other purpose.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Members of our group of companies.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Regulators and government agencies.

Where we engage data processors, we require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

4. International transfers

Some of our administrative third-party providers, such as our I.T. helpdesk, are based outside the European Union (EU) so they may from time to time access personal data in connection with the provision of their services. This is on an ad-hoc basis and their processing of your personal data will not involve a routine transfer of data outside the EU.

However, whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU.

5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. Data retention

How long will you use my personal data for?

We will not keep your personal data for longer than is necessary for the purpose for which it was collected. This is to ensure that information is properly managed and is available whenever and wherever there is a justified need for that information. Data is retained for specified periods (depending on the record) and then securely destroyed under our document retention policy.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

6. Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Senior Information Risk Owner in writing. The SIRO may be contacted at 22 St Andrews Street, London, EC4A 3AG or email data-protection@accordiahealthcare.co.uk.

No fee is usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in certain circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please

contact the Senior Information Risk Owner. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose, or purposes, you originally agreed to, unless we have another legitimate basis for doing so in law.

COMPLAINTS

You may contact our Senior Information Risk Owner using the details above if you are not happy with the way we have handled your personal information.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact the ICO by calling 0303 123 1113, emailing casework@ico.org.uk, or writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.