

# Intouch with Health Ltd Privacy Policy

### Who we are

This Privacy Policy applies to Intouch with Health Ltd. Registration number: 3758749

#### How to contact us

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact;

FAO Data Protection Officer
Intouch with Health Ltd
Unit 3, Querns Business Centre
Whitworth Road
Cirencester
GL7 1RT

Tel: 01285 657516

Email: info@intouchwithhealth.co.uk

### Information we collect and use

Information about you that we collect and use includes identity and contact data:

- Information about you e.g. your name, job title, your work email address and any other contact details
- Information connected to which of our products you use

### Where we collect your information

We may collect your personal information directly from you, from a variety of sources, including:

- an enquiry on our website about our products or services
- phone conversations with us
- emails or letters you send to us
- registering for an Intouch with Health Ltd event e.g. conference, user group, online demonstrations
- participating in research surveys
- our online services such as websites, social media

### What we collect and use your information for



We take your privacy seriously and we will only ever collect and use information which is personal to you where it is *necessary*, *fair and lawful* to do so. We will collect and use your information only where:

- you have previously given us your permission [consent] or we feel that there are legitimate
  grounds to send you information about products and services offered by Intouch with Health
  Ltd and / or selected third parties we have chosen to work with which we believe may be of
  interest and benefit to you
- it's necessary for us to meet our legal or regulatory obligations e.g. to tell you about changes in our Terms and Conditions e.g. new Service Level Agreements and End User Licence Agreements

After carrying out a Legitimate Interest Assessment (LIA), we feel we can rely on legitimate interests as a valid, legal basis for processing data:

- We keep the minimum possible data on individuals and this data only relates to the individual in a professional context.
- We only process data if we feel there is a high chance the individual will have a legitimate interest.
- We take all steps to ensure the safety, privacy and rights of the individual.

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with information about updates and upgrades to our products or services.

### Who we may share your information with

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for.'

These third parties include:

- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers e.g. research, consultancy or technology companies; or companies who can help us in our contact with you, for example an internet service provider
- Regulators and Supervisory Authority e.g. the Information Commissioner's Office for the UK (the ICO)

We will never sell your details to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

## Where your information is processed

Your information is currently only processed in the UK.

## How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way,



whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake annual training on this.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

### **Data Breaches**

Intouch with Health Ltd is aware of our responsibility to notify the ICO in the event of a serious personal data breach. Specifically where this is likely to result in a risk to the rights and freedoms of the individuals e.g. discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant social disadvantage.

In most cases, a time limit of 72 hours will apply. If the breach relates to customer data, any customers affected must be notified 'without undue delay'.

A **Security Incident Report form** should be completed. This form can be used where the incident is handled internally and the resolution and action plan will be included in the form.

In the event that the ICO needs to be notified, the same form can be used.

# How long we keep your information

We will keep your personal information where there is a legitimate reason to provide you with information about our products or services and unless you request to opt-out of communications from Intouch with Health Ltd. By law we have to keep basic information about our customers for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data.

## Your individual rights

You have several rights in relation to how Intouch with Health Ltd uses your information. They are:

### Right to be informed

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with – we do this in this Privacy Policy and privacy notices.

### Right of access

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (DSAR).

Right to request that your personal information be rectified



If your personal information is inaccurate or incomplete, you can request that it is corrected.

#### Right to request erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for Intouch with Health Ltd to continue to have it.

#### Right to unsubscribe from future contact

If you decide at any point that you no longer want to receive communications from Intouch with Health Ltd that are in addition to any legitimate contact e.g. marketing emails, you can unsubscribe at any time and we will ensure that all requests of opt-outs are honoured. There are a number of ways you can do this; there will either be an unsubscribe option at the bottom of e communication we send to you or you can contact us by email or letter using any of the contact details set out at the beginning of this notice.

#### Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.

### Right to object

You can object to Intouch with Health Ltd processing your personal information where: it's based on our legitimate interests; for direct marketing.

### How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please visit our <u>contact us</u> page.

If you are still unhappy, you can complain to our Supervisory Authority. Their contact details are:

UK - ICO