



COMPANY POLICIES & PROCEDURES

No.22

Privacy Notice

Version 3.0

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|---------------|------------------|---------------------------|-------------------------|
| May 2018 | 1.0 | Policy creation | Caroline Packer |
| November 2018 | 2.0 | Policy Revision | Kathryn Martin |
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Welcome to the Privacy Notice of DMR Collation Limited.

DMR Collation Limited respects your privacy and is committed to protecting your personal data. We will only process your personal data in accordance with this notice.

This Privacy Notice will inform you as to how we look after and process your personal data that you may provide to us or that we may collect from you when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

DMR Collation Limited is defined as a data controller under the General Data Protection Regulation (GDPR) and Data Protection Act 2018 and is registered with the Information Commissioner's Office (ICO) under ZA326402; our DPO is Caroline Packer.

Contact details:

If you have any questions our contact details are:

DMR Collation Limited
Unit 9 Bowker House
Lee Mill Bridge
Ivybridge
PL21 9EF

Telephone: 01752 892745

E-mail: support@dmrcollation.co.uk

The information we collect:

We process personal data including and not limited to:

- Name and job title.
- Contact information including e-mail address and telephone number.
- Invoice and delivery addresses.
- Client medical records and supporting documentation (for the performance of our legal services).

Legal grounds for processing your information:

We will rely on the following legal bases under GDPR to process your personal data:

1. Consent.
2. Performance of a contract.
3. Legal obligation.
4. Vital interest.
5. Public interest or exercise of official authority.

6. Legitimate interest pursued by the controller or 3rd party.
7. To accurately complete conflict of interest searches.
8. Provide a means to monitor when cases are concluded and when sensitive personal client data needs to be destroyed.

How we collect your information:

Voluntary Information

You may provide us this information when completing forms and contracts, corresponding via the telephone, e-mail or we may meet you at an event or exhibition.

Our legal services involve the collation and analysis of confidential client medical records which are provided to us on a voluntary basis by you (or your legal representatives).

Involuntary information when you visit our website

We may gain information that we gather through our monitoring of visits to our website. We use Google Analytics and cookies in order to improve our service, user experience and to analyse how the website is used.

Aside from the approximate location (IP address), the information collected is mostly anonymous traffic data including browser information, device information and language.

We do not collect any additional information which could be classified as personal via these means.

Cookie Policy:

Cookies may be used to gather analytics and assist with management of the DMR Collation website. Our website hosting service uses web analytics services to improve the usability and design of our customer experience. These services may record anonymous mouse clicks, mouse movements, and scrolling activity, but they never use them to collect personally identifiable information from you. We only use this data internally to help us understand and enhance your website experience.

How we process your information:

We collect and process data for the following reasons:

- to perform our services.
- to ensure we can fulfil our service levels to a high standard.
- internal record keeping.
- to improve our products and services.
- to ensure that our website is presented in the most effective manner.

- our legal requirements as a UK registered business.
- to communicate with our partners.
- to market our products and service (see Marketing below).

We will also provide information to 3rd parties, when it is necessary to fulfil your service requirements. These include but are not limited to 3rd party carriers for the return of completed work to our clients.

We only process your data in the UK. In all circumstances the information obtained will be retained and utilised in accordance with all applicable laws in particular, the Data Protection Act 2018 and GDPR. Accordingly, we will maintain and protect the confidentiality of your information.

Marketing:

We may from time to time contact you to make you aware of new products and services, unless you explicitly request us not to do so.

If you no longer wish to receive such communications, you can opt out by emailing us at support@dmrcollation.co.uk and by putting “opt out” in your email title.

We never share your name and contact details with third parties for marketing purposes. We may on occasion use third party service providers to send out marketing material but only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to comply with data protection legislation.

Data security:

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your information.

It is our policy that no client data will be provided to any external party to DMR Collation whether or not that data is already within the public domain.

DMR Collation will not disclose client information of any type to any third party, for any reason other than fulfilling our legal services, legal obligation or enforcing our terms of business.

Our Information Management & Security Policy and Data Protection Policy provide more specific information on how data is securely managed and stored.

Data retention:

We will only retain your personal data for as long as necessary to fulfil the purposes

we collected it for. This includes for the purposes of satisfying any legal, accounting, or reporting requirements.

How long will we keep personal data?

- For active customers we will retain data for as long as you remain active.
- For inactive customers we will retain data for accounting purposes only.
- On request of an 'unsubscribe' or a specific request not to be contacted, personal data will be transferred to a suppression list.
- We will keep personal data in our database for our own internal records.

Your Legal Rights:

Under certain circumstance, you have a legal right under data protection laws in respect of your personal data. Your rights are listed below:

- Request access to your personal data
- Update/amend inaccuracies or changes to your personal data.
- Opt out of e-mail marketing by emailing support@dmrcollation.co.uk with "Opt out" in the email title.
- Request for processing of your personal data to be restricted.
- Be informed of what lawful basis we are relying on for the processing of your personal data.
- Request erasure of your personal data.
- 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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.
- Request transfer of your personal data

If you wish to exercise any of the rights set out above, please contact our Data Protection Representative, Caroline Packer, on support@dmrcollation.co.uk.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In these instances, we will notify you and keep you updated.

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

Links to other websites:

Our website may contain links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Automated Decision Making:

We do not use any form of automated decision making in our business.

Changes to this Privacy Notice and your duty to inform us of changes

This version was last updated on 28 June 2019 and historic versions can be obtained by contacting us.

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.