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## Chapter 1: Introduction

1.1 Polaris Medical Services Ltd understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, <https://www.polarismedical.co.uk/> ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

## Chapter 2: Definitions and Interpretation

2.1 In this Policy the following terms shall have the following meanings:

- "Cookie" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out below.
- "Cookie Law" means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- "personal data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the DPA (Data Protection Act) 2018 and UK GDPR (General Data Protection Regulation) ;
- "We/Us/Our" means Polaris Medical Services Ltd, a private company registered in England, whose meeting address is 225 Berwick Avenue, Slough, Berkshire - SL1 4QT

## Chapter 3: Information About Us

3.1 Our Site is owned and operated by Polaris Medical Services Ltd.

3.2 Our Data Protection Officer is Mr Lee Power and can be contacted by email at [leepower@pmgoc.com](mailto:leepower@pmgoc.com)

## Chapter 4: What Does This Policy Cover?

4.1 This Privacy Policy applies only to all websites accessed via domain PMGOC.COM and POLARISMEDICAL.CO.UK domain . Our PMGOC.COM \ POLARISMEDICAL.CO.UK Sites may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

## Chapter 5: Your Rights

5.1 As a data subject, you have the following rights under the DPA (Data Protection Act) 2018 and UK GDPR (General Data Protection Regulation) , which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data
- The right of access to the personal data We hold about you
- The right to rectification if any personal data We hold about you is inaccurate or incomplete
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, but if you would like Us to delete it sooner, please contact Us
- The right to restrict (i.e. prevent) the processing of your personal data
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation)
- The right to object to Us using your personal data for particular purposes
- Rights with respect to automated decision making and profiling.

5.2 If you have any cause for complaint about Our use of your personal data, please contact Us and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

5.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

## Chapter 6: What Data Do We Collect?

6.1 Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data by using Cookies and similar technologies we may collect the following data points:

- Name
- Year of birth
- Ethnicity
- Gender
- Contact information such as residential\business address, email addresses and telephone numbers
- Demographic information including travel corridors and regional locations
- IP address
- Web browser type and version
- Operating system
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to

## Chapter 7: How Do We Use Your Data?

7.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the DPA (Data Protection Act) 2018 and UK GDPR (General Data Protection Regulation) at all times. For more details on security see below.

7.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a membership enquiry with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- Supplying Our services to you
- Personalising and tailoring membership services for you
- Replying to emails from you
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by contacting Us)
- Analysing your use of Our Site to enable Us to continually improve Our Site and your user experience

7.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email with information as deemed appropriate by Our Directors. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the DPA (Data Protection Act) 2018 and UK GDPR (General Data Protection Regulation).

7.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

7.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- Data collected and stored on this website will be retained for no longer than 3 years.
- Data collected and sent via email will be retained in an archive state for an indefinite period.
- Non Personal Data collected on your use of Our site will be kept for a maximum of 50 months.

## Chapter 8: How and Where Do We Store Your Data?

8.1 We only keep your personal data for as long as We need to in order to use it as described above in Chapter 7, and/or for as long as We have your permission to keep it.

8.2 Your data is stored using third parties processors that we have approved and chosen to help provide these services. Our Firm and cloud base supplier is OptivITy, <https://www.optivity.co.uk/>

8.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site. Where we use providers based in the US, we may transfer data to them, making sure they adhere to Standard Contractual Clauses (SCC's) which requires them to provide similar protection to personal data shared between the UK and the US. For further details, <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers-after-uk-exit/sccs-after-transition-period/>.

Steps We take to secure and protect your data include:

- We use secure and encrypted communications when using email, website and synchronising of data, using HTTPS.
- All administrative accounts use Two Factor Authentication as an additional layer of security. This includes Hosting Service Provider, Website Administrative Access, and Business Suite Administration.

## **Chapter 9: Do We Share Your Data?**

9.1 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

9.2 We may share your data with other Organisations we work closely with, such as patient transfers within the NHS.

9.3 We may sometimes contract with third parties to supply services to you on Our behalf. These may include search engine facilities, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

9.4 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as affiliates, and partner organisations. Data will only be shared and used within the bounds of the law.

The third party data processors used by Us and listed below, some are located outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Standard Contractual Clauses (SCC's) including:

- Google Inc. - Cloud based Email, Business Software & File Storage – we use Google Inc. GSuite range of products and services that retain data using secure data servers distributed geographically around the world.

9.5 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## **Chapter 10: What Happens If Our Organisation Changes Hands?**

10.1 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new changes or controller.

## **How Can You Control Your Data?**

11.1 When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails.

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## **Chapter 12: Your Right to Withhold Information**

12.1 You may access Our Site without providing any data at all. However, all features and functions available on Our Site may require you to submit a collection of certain data.

12.2 You may restrict Our use of Cookies. For more information, see chapter 13.

## **Chapter 13: Our Use of Cookies**

13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

13.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.

13.3 Before Cookies are placed on your computer or device, you will be shown a cookie notification message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

13.4 You may still block these Cookies by changing your internet browser's settings as detailed below in chapter 13.9, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

13.5 The following first party Cookies may be placed on your computer or device

<b>Name of Cookie</b>	<b>Purpose</b>	<b>Strictly Necessary</b>
Cookie Policy Notice	Tracks acceptance of Cookie Policy	No

13.6 Our Site uses analytics services provided by Google Inc. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

13.7 The analytics service used by Our Site use Cookies to gather the required information.

13.8 The analytics service used by Our Site use(s) the following Cookies:

<b>Name of Cookie</b>	<b>1<sup>st</sup>/3<sup>rd</sup> Party</b>	<b>Provider</b>	<b>Purpose</b>
_ga	3 <sup>rd</sup> Party	Google Inc.	Google Analytics Tracking

13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

13.10 You can choose to delete Cookies on your computer or device at any time.

13.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## **Chapter 14: Contacting Us**

14.1 If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [info@pmgoc.com](mailto:info@pmgoc.com). Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

## **Chapter 15: Changes to Our Privacy Policy**

15.1 We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.