



Althea UK and Ireland Limited Privacy Policy



ALTHEA

INTEGRATED HEALTHCARE
TECHNOLOGY MANAGEMENT

Althea UK & Ireland Ltd Privacy Policy
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Document Control

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This Privacy Policy covers the following:

- Who we are?
- What information do we collect?
- How do we use your information?
- Who may use your information?
- Third party links and services
- How do we protect your information?
- Where is your information processed?
- Marketing Communications
- How long do we keep your information?
- Your rights
- How do you contact us?

This Privacy Policy applies to all of the personal data we collect about you, including information collected on Althea-group.co.uk and any other websites (including mobile access) where this policy is linked to; all of which are referred to as the "Site" in this policy.

By providing information to us, you expressly agree to this Privacy Policy. This Privacy Policy was last updated on the 25th May 2018 and applies from that date.

We may occasionally amend this Privacy Policy. Any new policy will automatically be effective when it is published on the website. You should therefore return here regularly to view our most up to date Privacy Policy. You should also print a copy for your records.

This website is not intended for children and we do not knowingly collect data relating to children.

We strongly recommend that parents take an active role in supervising the online activities of their children. If you believe we have collected personal data from a person who is under the age of 16.

Who are we?

The Site is owned and operated by Althea UK and Ireland Limited and its affiliates. Althea UK and Ireland Limited is the data controller and responsible for your personal data. The company is incorporated in England and Wales under company number 04328629 registered address Unit 4 Ely Road, Theale, Berkshire RG7 4BQ. We refer to Althea UK and Ireland Limited, together with its group companies, as "we", "us" or "our" in this Privacy Policy.

What information do we collect?

Our core business is aimed at other businesses and organisations. As such, most of the personal data that we collect relates to contacts within the organisations that we provide goods or services to and contacts at our suppliers, or other third parties that we contract with.

Most of the information we collect is information provided directly by you. This may include:

- contact information - information such as name, job title, company name, department, email address, physical mailing address and telephone number;

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- professional information - such as your employment background, job description and related information;
- transaction information - your contact information, the products you are interested in, your purchasing requirements, your financial/payment information;
- responses to surveys - information you provide in responding to a survey on the website, via an app or email, on the telephone or otherwise;
- any other information collected.

We may also collect and process information obtained through the Site or the device you are using, including:

- location information (including GPS signals sent by a mobile device, location information gathered from social media networks or sensor or IP address data from your device);
- information from cookies, web beacons or from the internet, including your IP address, browser type, operating system, domain name, access times, which pages you visit within our website and referring website addresses. You can find out more about how we do that in our Cookies Policy;
- if you ask us to connect with other sites (for example if you ask us to connect with your Facebook account) we may get information that way too;
- we may record any telephone calls for quality assurance and training purposes;

Finally, we may use publicly accessible information to verify information we are provided with and to manage and expand our business.

Recruitment

If you use the website to apply to work with us, we will use the information you supply to process your application and to monitor recruitment statistics. We may also use publicly accessible information to verify information that you provide us with.

As a global business we may transfer your details outside of your home country and to other companies in our group. Where we want to disclose information to a third party, for example where we want to take up a reference we will not do so without informing you first unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held for up to 12 months after the recruitment exercise has been completed, it will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but individuals should not be identifiable from that data. Once a person has taken up employment with us, we will compile a file relating to their employment. At that stage we will give more details about how we hold employee data and we will expect the employee to sign up to additional privacy terms as part of their employment.

How do we use your information?

We use information collected about you as outlined in this Privacy Policy.

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 perform the contract we are about to enter into or have entered into with you. For example, processing an order you have made or responding to your request for information relating to our services.
- 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.



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This means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

- 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.

Our primary purpose in collecting your personal data is to provide you with the services you requested and those which we believe will optimise your use of the Site. We may use your personal data for the following purposes:

- to provide the information, services or support you request and related after-sales services;
- to identify you, and to contact you from time to time with product or service updates;
- to send other messages that are useful to the service we provide;
- to manage our relationship with you and to carry out any related administration;
- to provide personalised, targeted, or location-based content, services, and advertising from us;
- to promote our services, or the services of our partners, including by email and via social media platforms;
- to compare information for accuracy, and verify it with third parties;
- to detect, investigate and prevent activity we think may be potentially illegal, unlawful or harmful and to enforce our Privacy Policy and/or our Terms or any other purpose referenced herein or therein;
- to carry out research, including market research, statistical research on site traffic, sales and other commercial information to assist us in improving the services we provide to you and tailor the Site.

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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 where this is required or permitted by law.

Who may use your information?

We may disclose your personal data to enforce our policies, to comply with our legal obligations or in the interests of security, public interest or law enforcement in any country where we have entities or affiliates.

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For example, we may respond to a request by a law enforcement agency or regulatory or governmental authority. We may also disclose data in connection with actual or proposed litigation, or to protect our property, security, people and other rights or interests.

We share your information with third parties who help deliver our products and services to you. Examples include hosting our web servers, analysing data, providing marketing assistance, and providing customer service. These companies will have access to your personal information as necessary to perform their functions, but they may not use that data for any other purpose.

We may also share your personal data:

- with companies in our group and/or our affiliates; or
- with any third party you have asked us to share your personal data with - such as Facebook or any other social media site if you have asked us to connect with your account.

You may have accessed our website through a hyperlink from the website of one of our trading partners. If so, you consent to your personal details and purchase information, including behavioral patterns, being shared with that trading partner in accordance with our contractual relationship with them.

If we or any part of our group is sold, or some of its assets transferred to a third party, your personal information, as a valuable asset, may also be transferred to the acquirer, even if they are not in the same line of business as us. Our customer database could be sold separately from the rest of the business, in whole or in a number of parts. Potential purchasers and their advisors may have limited access to data as part of the sale process. However, use of your personal information will remain subject to this Privacy Policy.

Similarly, your personal information may be passed on to a successor in interest in the unlikely event of a liquidation, bankruptcy or administration.

Please remember that when you share information publicly on the Site, for example a comment on a blog post, it may be indexable by search engines, including Google, which may mean that the information is made public.

Third party links and services

The Site may contain links to third parties' websites. We are not responsible for the privacy practices or the content of those websites. Therefore, please read carefully any privacy policies on those links or websites before either agreeing to their terms or using those websites.

We may also use Google Analytics to gather statistics on site usage. This may involve the use of cookies. There are more details in our Cookies Policy and in Google's own privacy policy.

Google may aggregate data they collect from their various services including Google Analytics, Google Translate, Google Maps and YouTube. You acknowledge and accept that we have no control over Google's data collection. You should look at Google's privacy policy for details of their data collection practices.

If you have asked us to share data with third party sites (such as social media sites), their servers may not be secure.



Note that, despite the measures taken by us and the third parties we engage, the internet is not secure. As a result others may nevertheless unlawfully intercept or access private transmissions or data.

How Do We Protect Your Information?

We take what we consider to be appropriate technical and organisational measures to guard against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data. While no system is completely secure, we believe the measures implemented by the Site reduce our vulnerability to security problems to a level appropriate to the type of data involved. We have security measures in place to protect our user database and access to this database is restricted internally.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties 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.

Where is your information processed?

In some circumstances we work with suppliers and partners who may make use of cloud and/or hosted technologies. We undertake data security due diligence on our partners and ensure that that these partners conform to appropriate accreditations and employ European Commission approved contract documentation to safeguard your privacy rights.

International transfers

We may share your personal data within the Althea Group companies. This may involve transferring your data outside the European Economic Area (EEA).

Some specially selected external third party suppliers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

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

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

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



Marketing communications

If you have given permission, we may contact you by mail, telephone, SMS, text/picture/video message, fax, email about our products and services that may be of interest to you. If you prefer not to receive any direct marketing communications from us, you can opt out at any time. See further 'Your rights', below.

How long do we keep your information?

We will retain your personal data only as long as is necessary for the purposes set out in this Privacy Policy, or as is required by applicable law, and then we will delete it.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your rights

We recognise that you have the right to access the personal data we hold on you by way of a "subject access request". If you wish to make such a request, please email us at dpo@althea-group.com setting out the scope of your request. We will need proof of ID so that we can verify your identity before releasing your personal data to you.

We further recognise that you have a right to change, restrict our use of, or request the deletion of personal data we hold about you. This could include changing your contact details or your payment details or cancelling your account. There may be circumstances where we are unable to delete your details if we need them for a legitimate reason, in which case we will tell you the reason why we are not able to adhere to your request for erasure. If you wish to exercise any of these rights, please send the details of your request to dpo@althea-group.com.

You also have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right, you should:

- put your request in an email sent to dpo@althea-group.com with a header that says 'Unsubscribe');
- provide us with enough information to identify you (e.g. name, address, registration details); and
- if your objection is not to direct marketing in general, but to direct marketing by a particular channel (e.g. email or telephone), please specify the channel you are objecting to.

For personal data that you have provided to us, you have the right to ask us for a copy to be transferred to you or another third party (data portability). If you wish to do this, please send the details of your request to dpo@althea-group.com

How do you contact us?

If you have any questions about this Privacy Policy, the practices of this Site, or your dealings with this Site, we encourage you to contact us at dpo@althea-group.com.

Complaints

If you have any concerns regarding our use of your personal data, we hope that you will contact us in the first instance by emailing dpo@althea-group.com. However, 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).