

This website, zimed.co.uk (**our website**) is provided by Medicom Healthcare Limited (**'we', 'our' or 'us'**). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**).

This version of our privacy policy is primarily written for adults, including parents and guardians of child users.

### **What this policy applies to**

This privacy policy relates to your use of our website only.

Throughout our website we may link to other websites owned and operated by certain trusted third parties. Those third party websites may gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third party websites, please consult their privacy policies.

### **Personal data we collect about you**

We will collect and use the following personal data about you:

- your email address (if you provide it)
- your IP address (if you provide your email address)
- which Integrated Care Board (ICB) you are a member of (if you provide it)

If you do not provide your email address where you are a Health Care Professional, it will prevent you from accessing those parts of the website provided for Health Care Professionals only. This is how we ensure that we do not provide information for Health Care Professionals only to members of the public or patients who we are legally obliged not to provide such information to.

We collect and use personal data for the purposes described in the section '**How and why we use your personal data**' below.

### **How your personal data is collected**

We collect personal data from you:

- directly when you submit your email address or ICB as a Health Care Professional
- indirectly your IP address using the technologies explained in the section on **Cookies**.

### **How and why we use your personal data**

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent
- to comply with our legal and regulatory obligations
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Customise our website content depending on your status as a patient, member of the public or Health Care Professional	To provide you with relevant content as accurately and efficiently as possible
Customise our website content to your preferences based on your status as a Health Care Professional and your ICB where applicable	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>• Your consent as gathered by cookies on our website – see <b>Cookies</b> below</li> <li>• where we are not required to obtain your consent and do not do so, for our legitimate interests of providing you with relevant content as accurately and efficiently as possible</li> </ul> <p>If you have provided such a consent you may withdraw it at any time by clicking on <a href="#">this link</a> (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p>
Marketing our products to you where you are a Health Care Professional	<p>For our legitimate interests of promoting our products to you as a Health Care Professional</p> <p>See '<b>Marketing</b>' below for further information</p>
To process and consider any request you submit via email when you click on the Contact Us link or via an email to any of our email addresses listed on our website	To respond/answer your request as efficiently as possible and accurately

### How and why we use your personal data—in more detail

More details about how we use your personal data and why are set out in the table below.

Purpose	Processing operation	Lawful basis relied on under UK GDPR	Relevant categories of personal data
To customise our website content depending on your status as a patient, member of the public or Health Care Professional	Storing your email address and linking it to your captured IP address and the ICB which you are a member of	Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b) and/or our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the correct content to you	<ul style="list-style-type: none"> <li>• your email address (if you are a Health Care Professional)</li> <li>• your IP address (if you are a Health Care Professional)</li> <li>• your ICB (if you are a Health Care Professional)</li> </ul>
To validate that you are a Health Care Professional (where applicable)	Storing your email address and validating that it belongs to a relevant organisation	Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))	<ul style="list-style-type: none"> <li>• your email address (if you are a Health Care Professional)</li> </ul>
Communications with you relating to marketing	Storing your email address	Your consent (Article 6(1)(a))	<ul style="list-style-type: none"> <li>• your email address (if you are a Health Care Professional)</li> </ul>

Purpose	Processing operation	Lawful basis relied on under UK GDPR	Relevant categories of personal data
Communications with you not related to marketing	Addressing and sending communications to you as required by data protection laws, including UK GDPR or the Data Protection Act 2018	Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))	<ul style="list-style-type: none"> <li>your email address (if you are a Health Care Professional)</li> </ul>
Communications with you not related to marketing, including about changes to our terms or policies or changes to the products or other important notices	Addressing and sending communications to you about changes to our terms or policies or changes to the products or other important notices (other than those addressed above)	Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you	<ul style="list-style-type: none"> <li>your email address (if you are a Health Care Professional)</li> </ul>
To process and consider any request you submit via email when you click on the Contact Us link or via an email to any of our email addresses listed on our website	Addressing and sending communications to our relevant staff in order to determine an answer to your enquiry and to communicate the answer/response back to you	Your consent (Article 6(1)(a)) and/or our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you	<ul style="list-style-type: none"> <li>your name, email address and organisation name (if applicable)</li> <li>any other personal data which you may voluntarily provide to us in your communications</li> </ul>

### How and why we use your personal data—sharing

See **'Who we share your personal data with'** for further information on the steps we will take to protect your personal data where we need to share it with others.

### Marketing

We will use your personal data to send you updates by email about our products and services.

You have the right to opt out of receiving marketing communications at any time by:

- clicking [this link](#)
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations outside the Medicom Healthcare group for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see '**Your rights**' below.

### **Who we share your personal data with**

We routinely share personal data with:

- other third parties we use to help us run our business, e.g. our website host

We only allow those organisations to handle your personal data once we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations
- our professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations

### **Who we share your personal data with—in more detail**

More details about who we share your personal data with and why are set out in the table below.

Recipient	Processing operation (use) by recipient	Relevant categories of personal data transferred to recipient
101Smart Limited, Unit 15 Beech Avenue, Taverham,	Hosting and operation of our website storing your personal data to allow you to access the relevant part of	All data collected via the website

Recipient	Processing operation (use) by recipient	Relevant categories of personal data transferred to recipient
Norwich, Norfolk, NR8 6HW, UK	the website more easily on future visits where you are a Health Care Professional and to communicate with you for marketing and non	

### Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

### How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

### Transferring your personal data out of the UK

We will not transfer your data outside of the UK.

### Cookies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store your email address and IP address where you are a Health Care Professional.

For further information on cookies and our use of cookies, when we will request your consent before placing them and how to disable them, please see our [Cookie Policy](#).

### Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data

Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations
To object to use	The right to object: <ul style="list-style-type: none"> <li>• at any time to your personal data being used for direct marketing (including profiling)</li> <li>• in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims</li> </ul>
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you  We do not make any such decisions based on data collected by our website
The right to withdraw consents	If you have provided us with a consent to use your personal data, you have a right to withdraw that consent easily at any time  You may withdraw consents by emailing us at <a href="mailto:dataprotection@medicomhealthcare.com">dataprotection@medicomhealthcare.com</a>  Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see '**How to contact us**' below). You may also find it helpful to refer to the [guidance from the UK's Information Commissioner](#) on your rights under the UK GDPR.

Please email us at [dataprotection@medicomhealthcare.com](mailto:dataprotection@medicomhealthcare.com) if you would like to exercise any of those rights. When contacting us please:

- provide enough information to identify yourself i.e. your full name and email address as well as any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

## **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

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

## **How to complain**

Please contact us if you have any queries or concerns about our use of your personal data. We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA.

The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

For a list of EEA data protection supervisory authorities and their contact details see [here](#).

## **Changes to this privacy policy**

We may change this privacy policy from time to time. When we make significant changes we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by email.

## **How to contact us**

You can contact us by email, telephone or post:

Email: [dataprotection@medicomhealthcare.com](mailto:dataprotection@medicomhealthcare.com)

Telephone: +44 1489 574119

Address: Data Protection Officer, Medicom Healthcare Limited, Gainsborough House, 59-60 Thames Street, Windsor, SL4 1TX, UK

**Policy Version: 1.1**