



Our website privacy notice

1. Introduction

This is our privacy policy. It tells you how we collect and process your data when you use our website: <https://www.conexus-healthcare.org>

This includes any personal information that you give us – for example when you fill out a form, signup for our newsletter or contact us.

By providing us with your data, you warrant to us that you are over 13 years of age. If you have any comments on this privacy policy, please email them to: contact@conexushealthcare.org.

2. About us

Conexus Healthcare CIC is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Company: **Conexus Healthcare CIC**

Email address: contact@conexus-healthcare.org

Postal address: Conexus Healthcare CIC, C/O Sandal Castle Medical Centre, Asdale Road, Wakefield WF2 7JE

*Data controller: Conexus Healthcare CIC

*Our data controller decides how and why personal data is processed ensuring it meets applicable European Union data protection laws.

Tim Johns, Head of Corporate Services and Company Secretary, is our nominated representative and is in charge of privacy-related matters for us. If you have any questions about this privacy notice, including our Data Protection Impact Assessments (DPIA), please contact us using the details set out above.

Please contact us straightaway if:

- You have any concerns or questions about how we collect and use your data.
- The personal information you have given us has changed.
- You want to see what information we have about you.

We take your privacy very seriously and try to adhere to the highest standards when collecting and processing your data. In the unlikely event you are not happy with our privacy practices, you may lodge a complaint with the Information Commissioner's Office. You can contact the Information Commissioner's Office helpline on 0303 123 1133 or by email to: casework@ico.org.uk.

3. What data we collect about you

Personal data

We get personal information about you when:

- you contact us about our services through a contact form on our website, by telephone, email or otherwise.
- you contact us and give us your personal information through social media sites such as Twitter or LinkedIn.

The types of personal information we might store includes your name, the organisation you work for, telephone number and your email address. It might also include your bank account details if you purchase a service from us.

Technical & usage data

This may include your internet protocol (IP) addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.

Our website uses cookies. Cookies are text files placed on your computer to collect standard internet log information and visitor information. These cookies allow us to distinguish you from other users of the website and allow us to collect information about your visit to our website.

For more information on which cookies we use and how we use them, see our Cookies policy.

We may also receive anonymised information about your use of the website – this information will not identify you personally. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, only then it is treated as personal data.

We also use third party applications to make our website function better or to improve your user journey and experience on our website. This includes Google Analytics.

We also may receive data about you from other third parties that we work with including for example payment & delivery services and advertising networks such as Facebook.

Marketing and Communications Data

This may include your preferences in receiving marketing communications from us and your communication preferences. You will find this on our website forms or carefully targeted direct mail.

Your personal data belongs to you. We are only allowed to collect and use it if we have a lawful basis for doing so which you can read about in the next section.

4. How we use your personal data

We will only use your personal data when legally permitted. We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

If you need more details about the specific legal ground we are relying on to process your personal data, email us at: contact@conexus-healthcare.org.

The most common uses of your personal data are:

- To send you information, products or services that you have asked for or that are similar to those that you have already purchased or enquired about. The information we may process for this purpose includes your name, address and email address. This processing is necessary for marketing and promotion of our products and services, which is for the legitimate interests of our business. Please see 'Marketing' section below.
- To perform the contract or supply you with the products or services you have asked for. The basis for this processing is to perform the contract with you related to these activities and services or because you have asked us to take specific steps before entering into a contract in respect to these activities and services.
- To look at how we can make the information, products and services we offer to you better (including this website).
- To contact you with news of our organisation and information about the work we do. This processing is necessary for the administration of our business and the provision of our services, which is necessary for the legitimate interests of our business.
- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. The information we may process for this purpose includes your name, address and email address. This processing is necessary for marketing and promotion of our products and services, which is for the legitimate interests of our business.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- 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. For example, if we send you a piece of direct mail that is highly targeted to your interests and you receive it every now and again – i.e. not every week and isn't relevant at all and there is a clear option to opt-out.
- To ensure that the web pages on our site are presented in the most effective manner for you and for your device.
- To keep our website safe and secure for example if there is a 'website gremlin' you notify us about and we need to troubleshoot why a web page wouldn't load properly.
- Where we need to comply with a legal or regulatory obligation. See Disclosures section for more details.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message.

When you receive any of our electronic newsletters or emails, you will have the ability to unsubscribe from our mailing list.

You can ask us to stop sending you marketing messages at any time. If you would like to do this, please email or call us using the contact details at the top of this page.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation

To deliver relevant content and updates about our work to you and to measure and understand the effectiveness of our work	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

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 we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

Please contact us if you have any queries about this.

We may process your personal data without your knowledge or consent where this is required or permitted by law. See Disclosures section below for more details.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers of your information

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

From time to time, we may need to transfer your personal data to countries that are located outside the European Economic Area (“EEA”) for the purposes of processing by parties that work for Conexus Healthcare CIC or one of its suppliers. We only use a small number of third parties service providers based outside the European Economic Area (EEA) but 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 do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or

Please contact us if you want any further information on transfers of your personal data out of the EEA. We complete Data Protection Impact Assessments (DPIA), summaries are available upon request.

7. How we protect your data

We will make sure that any personal information that you give to us is kept secure, accurate and up to date, and only keep it for as long as it is needed any only for the purposes for which you have agreed we can use it.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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 such data. 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.

Unfortunately, the transmission of information via the internet is not always completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. Your legal rights

You have the right to ask for a copy of the information that we have about you and you can ask us to correct any incorrect data we have about you too. You can also:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.
- Right to ask us to stop contacting you with direct marketing.

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 small fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

If you wish to exercise any of the rights set out above, please email us at: contact@conexushealthcare.org.

You can read more about your legal rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

9. Third party links

This website may include 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.

We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

10. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For more information about the cookies we use, please see our Cookies Policy.

11. Changes to the privacy policy

We may change this privacy policy from time to time. Any changes we make to this privacy policy will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to this privacy policy.

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