## **Privacy Notice**

- 1. Consentricare Ltd. ("the Company") recognises the significance and importance of data protection. The purpose of this policy is to protect all personal information controlled or processed by the Company, and to ensure an adequate level of awareness to ensure data protection principles are applied across all areas of operation within the Company.
- 2. Personal data is identified and managed in accordance with a data protection risk assessment methodology that ensures adherence to acceptable risk levels. Our Data Protection Policy is enacted through a stringent set of controls, including policies, processes, procedures and software and hardware functions.
- 3. These controls are monitored and periodically reviewed and improved by the board of the Company to ensure that specific data protection, security and business objectives are met in line with the applicable statutory, regulatory and contractual requirements.
- 4. The Company is committed to compliance with data protection requirements and good practice to ensure:
  - a. The processing of personal information only where and to the extent that this is strictly necessary for legal and regulatory purposes, or for legitimate organisational purposes;
  - b. Processing only the minimum personal information required for these purposes;
  - c. Providing on request clear information to those whose data is held about how their personal information can be used and by whom;
  - d. Only processing relevant and appropriate personal information;
  - e. Processing personal information fairly and lawfully;
  - f. Maintaining a documented inventory of the categories of personal information processed by the organisation;
  - g. Keeping personal information accurate and, where necessary, up-to-date;
  - h. Retaining personal information only for as long as is necessary for legal or regulatory reasons or for legitimate organisational purposes and ensuring timely and appropriate disposal;
  - i. Respecting the rights of the individual in relation to their personal information;
  - j. Keeping personal information secure;
  - k. Only transferring personal information outside the UK in circumstances where it can be adequately protected;
  - I. Developing and implementing GDPR compliance to enable the data protection policy to be implemented;
  - m. Identify workers with specific responsibility and accountability for GDPR;
  - n. Maintain records of processing of personal information.
- 5. In addition to our employees; suppliers, contractors and sub-contractors of the Company are expected to adhere to our Data Protection Policy. The Company is committed to continual improvement and all employees are empowered to take responsibility for data protection. Through compliance to applicable statutory, regulatory and contractual requirements, and the requirements of the General Data Protection Regulations (GDPR) for the Protection of Personal Information, the Company will demonstrate our integrity and credibility.

## Use of your data

- 6. Your data may be used for the following purposes:
  - a. Providing products and services you request
  - b. For accounting, billing and audit purposes and to detect and / or prevent any fraudulent activities;
  - c. Administrative or legal purposes: we use your data for statistical and marketing analysis, systems testing, customer surveys, maintenance and development, or in order to deal with a dispute or claim. By providing any personal data you explicitly agree that we may use it to perform profiling activities in accordance with this Privacy Policy;
  - d. Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements;
  - e. Customer Services communications: we use your data to manage our relationship with you as our customer and to improve our services and enhance your experience with us;
  - f. Provide tailored services: we use your data to provide information we believe is of interest to you, prior to, during, and after your use of the App and to personalise the services we offer to you.
  - g. Marketing: from time to time we may contact you with information regarding in house promotions via e-communications. You may opt in or opt out of receiving such communications by indicating your choice at the registration stage. You will also be given the opportunity on every e-communication that we send you to indicate that you no longer wish to receive our direct marketing material.
  - h. We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for.
  - i. Only children aged 16 or over can provide their own consent.
  - j. We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.
  - k. When we no longer need your personal data, we will securely delete or destroy it.

## Sharing of your data with third parties

- 7. Your personal data may be shared with third parties for the purpose described in this Privacy Policy:
  - a. Government authorities and law enforcement bodies
  - b. Legal and other professional advisers, law courts and law enforcement bodies in all countries.
  - c. Advice, product or service providers accessed via the App for the purposes of identification and of enhancing your experience with us.

## Your data protection rights

- 8. Under certain circumstances, by law you have the right to:
  - a. Request information about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
  - b. Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
  - c. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
  - d. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
  - e. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
  - f. Object to automated decision-making including profiling, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
  - g. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
  - h. Request transfer of your personal information in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
  - i. Withdraw consent. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Please note that our Privacy Notice may change from time to time and any changes to the Notice will be communicated to you by way of an e-mail or a notice on our website.