

## LAKELAND ORTHOTICS LTD PRIVACY AND COOKIE USAGE POLICY

### Changes to this privacy policy

Lakeland Orthotics Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact Lakeland Orthotics Ltd by email at [Info@lakelandorthotics.co.uk](mailto:Info@lakelandorthotics.co.uk).

**This policy was reviewed and updated on 22dn May 2018.**

### DATA PROTECTION

Data protection and compliance with GDPR is very important to us and we've taken the time to detail all areas of our data usage in our Privacy Policy & Cookie Usage Policy below.

Any personal information you give us will be treated with the care and respect that it deserves and in a manner of your choosing, and will always be held securely. We only ever collect the data we need and you will only ever receive marketing emails from us if you choose to do so. Your data will never be sold or passed on to anyone other than internal employees and contractors of Lakeland Orthotics Ltd.

When you browse our website we do use cookies which help our website work more effectively and provide a better user experience for you. However, you can turn off cookies at any time using your web browser settings. Other than that you can expect to receive a top quality service from us leaving you 100% satisfied!

If you would like to read in much more detail about how we collect, store and use your personal data, exactly which data we do collect, how long we keep it and how we keep it secure, what we might use it for and who else might see it, please read our full Privacy Policy and Cookie Usage Policy below, or email us at [info@lakelandorthotics.co.uk](mailto:info@lakelandorthotics.co.uk).

### COOKIE USAGE POLICY

#### What information is being collected?

When you visit our website we use cookies to collect data on how you browse our site. A cookie is a small file placed on your computer's hard drive. It enables our website to identify your computer as you view different pages on our website.

Cookies allow websites and applications to store your preferences in order to present content, options or functions that are specific to you. They also enable us to see the following information: -

- How many people use the website and how many come back again
- Which pages they tend to visit
- Which country they are from
- The type of device they used to view the website
- What time of day the visit took place
- How you arrived at the site - via organic search, paid search, social media or by entering in our domain name directly

## **The kinds of cookies we use:**

We use three kinds of cookies on our website:

1. Session (Transient) cookies: these cookies are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user.
2. Persistent (Permanent/Stored) cookies: these cookies are stored on your hard drive until they expire (i.e based on a set expiration date) or until you delete them. These cookies are used to collect identifying information about the user, such as web surfing behaviour or user preferences for a specific site.
3. Third Party Cookies: Some cookies on this website are set by Google. An example of a cookie set by Google is NID and it contains a unique ID that Google uses to remember your preferences such as your preferred language. By following us on Twitter and Facebook, you will be prompted to log into your own social media accounts. This means that cookies may be placed in your browser by these social media platforms. You should consult the respective privacy policies of these third-parties for more detailed information on their practices as well as for instructions about how to opt-out of certain practices. Our privacy policy does not apply to, and we cannot control the activities of, other websites.

## **How will this information be used?**

We use this information to:

- Analyse our web traffic using an analytics package. Aggregated usage data helps us improve the website structure, design, content and functions.
- Test content on our website by showing different content to different users to see which is the most appealing.
- To recognise when you return to our website. We may show your relevant content, or provide functionality you used previously.
- Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

## **Why is this information being collected?**

We may use these cookies to help improve the performance of our website and to gain better insight into ad placement and customer behaviour.

## **How long do we keep this data?**

You are able to delete cookies from your web browser at any time. If you don't delete them, the cookies will naturally expire.

## **Controlling cookies**

You can use your web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device, you should set your web browser to refuse cookies. However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you. Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it.

### **How is this information secured?**

This information can only be accessed via a password protected Google analytics account. Google are also protected under the EU privacy shield and comply with all necessary requirements for data protection.

### **Who will this information be shared with?**

This data would only ever be shared with a consultant we may bring in help analyse our web traffic and suggest improvements to our site.

### **How will us collected this information effect you?**

You won't notice any difference when browsing and using our website.

### **LINKS FROM OUR WEBSITE**

Our website may contain links to other websites, such as Facebook and Twitter. Please note that we have no control of websites outside the domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy. Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.

### **PRIVACY POLICY**

#### **THE INFORMATION WE COLLECT WHEN YOU PURCHASE FROM OUR WEBSITE OR DIRECT WITH US**

When you purchase a product or service from our website online [www.lakelandorthotics.co.uk](http://www.lakelandorthotics.co.uk) or direct from us your name, delivery address, purchase address data, email and contact number will be stored by us in our accounting software Sage, our card payment gateway Sage Pay and in our e-commerce admin site woocommerce. Please be assured that we do not share your personal details with any other company without your consent.

#### **THE INFORMATION WE COLLECT DURING AN APPOINTMENT**

##### **What information is being collected?**

Any relevant personal information collected via NHS referral or private clinic self referral at the initial appointment time by ourselves is a legal requirement. This information is collected and recorded on paper on a patient record card. Personal information we collect includes name, address, email address, date of birth, diabetic status, any allergies, medications, current infections, other relevant information and the name and address of your GP.

##### **How will this information be used?**

This record card is used to collect relevant medical information prior to any consultation or treatment. We need to use this information to ensure any recommendation, product or treatment we give you is suitable based on medical conditions or medication taken for your safety.

##### **How long do we keep this data?**

Record cards are kept Indefinitely.

### **How is this information secured?**

Patient records are stored securely. Patient records must be updated where necessary and treatment notes recorded at each treatment appointment. This is a legal requirement. As such we only keep paper copies of our patient records and they are kept in a secure, locked area and do not leave our premises.

### **Who will this information be shared with?**

Patient record card information is viewable by the clinic team at Lakeland Orthotics Ltd or if required, by an associate member of the clinic prior to any consultation or treatment. We may write to your referring health care professional with the outcome of your consultation if you have been referred.

### **SUBSCRIPTION TO OUR MARKETING EMAILS**

On the Lakeland Orthotics Ltd website, users are given the opportunity to subscribe to our marketing emails. The sign up form used for this purpose asks for your name and email address.

Lakeland Orthotics Ltd informs its customers and business partners regularly by means of a marketing email about offers and promotions. The marketing email may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers to receive marketing emails.

The personal data collected as part of a registration for marketing emails will only be used to send our marketing emails. In addition, subscribers to our marketing emails may be informed by e-mail, as long as this is necessary for the operation of the marketing emails service or a registration in question, as this could be the case in the event of modifications to the marketing emails offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the marketing emails service to third parties. The subscription to our marketing emails may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for marketing emails, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each marketing email. It is also possible to unsubscribe from our marketing emails at any time by contacting us at [info@lakelandorthotics.co.uk](mailto:info@lakelandorthotics.co.uk).

### **YOUR RIGHTS**

Under GDPR, the data subject has the right to access and amend any of their personal data that we hold. As such you are entitled to view, amend, or delete the personal information that we hold. Email your request to our data protection officer Rebecca Smith at [info@lakelandorthotics.co.uk](mailto:info@lakelandorthotics.co.uk)

In addition:

#### **a) Right of confirmation**

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

## **b) Right of access**

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

## **c) Right to rectification**

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

## **d) Right to erasure (Right to be forgotten)**

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Lakeland Orthotics Ltd, he or she may, at any time, contact any employee of the controller. An employee of Lakeland Orthotics Ltd shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employees of Lakeland Orthotics Ltd will arrange the necessary measures in individual cases.

#### **e) Right of restriction of processing**

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by Lakeland Orthotics Ltd, he or she may at any time contact any employee of the controller. The employee of Lakeland Orthotics Ltd will arrange the restriction of the processing.

#### **f) Right to data portability**

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the

performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of Lakeland Orthotics Ltd.

#### **g) Right to object**

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Lakeland Orthotics Ltd shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Lakeland Orthotics Ltd processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Lakeland Orthotics Ltd to the processing for direct marketing purposes, Lakeland Orthotics Ltd will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Lakeland Orthotics Ltd for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of Lakeland Orthotics Ltd. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

#### **h) Automated individual decision-making, including profiling**

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Lakeland Orthotics Ltd shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of Lakeland Orthotics Ltd.

**i) Right to withdraw data protection consent**

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of Lakeland Orthotics Ltd.