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## PRIVACY POLICY

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### BACKGROUND:

Dowling, Best and Smith Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <https://norwichspinalhealth.co.uk> (Our Site) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested <<insert point(s) at which acceptance is requested>>.

### 1. Information About [Us] OR [Me]

Our Site is owned and operated by Dowling, Best and Smith Limited, A Limited Company registered in England under company number 11648934..

Registered address: 71-75 Shelton Street, London WC2H 9JQ

Main trading address: 71-75 Shelton Street, London WC2H 9JQ

Data Protection Officer: Daniel Rupert

Email address: [gdpr@dowlingbestsmith.co.uk](mailto:gdpr@dowlingbestsmith.co.uk)

Postal address: March Studio, Bromley Kent BR2 9NS

We are regulated by the Information Commissioner's Office

We are a member of the Information Commissioner's Office Member No.: Z6314976

### 2. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which [we] OR [I] will always work to uphold:

- a) The right to be informed about our or collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can

always contact us to find out more or to ask any questions using the details in Part 12.

- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

## 5. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data and personal data relating to children or data relating to criminal convictions and offences.

Data Collected	How We Collect the Data
[Identity Information including <<insert data collected, e.g. name, title, date of birth, gender>>.]	<<insert method of collection and/or source(s)>>.

[Contact information including <<insert data collected, e.g. address, email address, telephone number>>.]	<<insert method of collection and/or source(s)>>.
[Business information including <<insert data collected, e.g. business name, job title, profession>>.]	<<insert method of collection and/or source(s)>>.
[Payment information including <<insert data collected, e.g. card details, bank account numbers>>.]	<<insert method of collection and/or source(s)>>.
[Profile information including <<insert data collected, e.g. preferences, interests, login details, purchase history>>.]	<<insert method of collection and/or source(s)>>.
[Technical information including <<insert data collected, e.g. IP address, browser type and version, operating system>>.]	<<insert method of collection and/or source(s)>>.
[Data from third parties including <<insert data collected, e.g. technical information, contact information, profile information>>.]	<<insert method of collection and/or source(s)>>.
[<<add further information as required>>.]	

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on Our Site.	<<insert data type(s)>>.	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are)>>.
Administering Our Site.	<<insert data type(s)>>.	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are)>>.
Administering our business.	<<insert data type(s)>>.	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are)>>.
Supplying our products <b>and</b> services to you.	<<insert data type(s)>>.	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are)>>.
Managing payments for our products and services.	<<insert data type(s)>>.	<<insert lawful basis (if "legitimate interests", state

		what the legitimate interest(s) is or are>>.
Personalising and tailoring our products and services for you.	<<insert data type(s)>>.	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are)>>.
Communicating with you.	<<insert data type(s)>>.	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are)>>.
Supplying you with information by email or post that you have opted-in-to (you may opt-out at any time by emailing us your request.	<<insert data type(s)>>.	<<insert lawful basis (if "legitimate interests", state what the legitimate interest(s) is or are)>>.
[<<add further uses as required>>.		

With your permission or were permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and telephone or text message or post with information, news, and offers on our products or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We use the following automated systems for carrying out certain kinds of decision-making. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 12.

- [The following automated decision-making method(s) may be used:
  - <<insert simple description of automated decision-making including the legal basis on which you rely, the data used, the reason(s) for using that data, and the intended result and effects>>.
  - <<add further methods as required>>.]
- [The following automated profiling may take place:
  - <<insert simple description of profiling including the legal basis on which you rely, the data used, the reason(s) for using that data, and the intended result and effects>>.
  - <<add further methods as required>>.]

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new

purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
[Identity Information including <<insert data collected, e.g. name, title, date of birth, gender>>.]	<<insert details of retention period, or how retention will be determined if no fixed period>>.
[Contact information including <<insert data collected, e.g. address, email address, telephone number>>.]	<<insert details of retention period, or how retention will be determined if no fixed period>>.
[Business information including <<insert data collected, e.g. business name, job title, profession>>.]	<<insert details of retention period, or how retention will be determined if no fixed period>>.
[Payment information including <<insert data collected, e.g. card details, bank account numbers>>.]	<<insert details of retention period, or how retention will be determined if no fixed period>>.
[Profile information including <<insert data collected, e.g. preferences and interests, username and password, purchase history>>.]	<<insert details of retention period, or how retention will be determined if no fixed period>>.
[Technical information including <<insert data collected, e.g. IP address, browser type and version, operating system>>.]	<<insert details of retention period, or how retention will be determined if no fixed period>>.
[<<add further information as required>>.]	

## 8. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation. Or We store some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

We ensure that your personal data is protected under binding corporate rules. Binding

corporate rules are a set of common rules which all our group companies are required to follow when processing personal data. For further information, please refer to the [Information Commissioner's Office](#).

Please contact us using the details below in Part 12 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality.
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## 9. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10. **Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

## 11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 21 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Rosemary Folker:

Email address: [gdpr@norwichspinalhealth.co.uk](mailto:gdpr@norwichspinalhealth.co.uk)

Telephone number: 01603 216430.

Postal Address: 252 Heigham Street, Norwich, Norfolk NR2 4LQ.

## 13. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 4<sup>th</sup> April 2021.