

General Privacy Policy

Dr. C.D.Buckingham,

Policy ownership: C. Nicklin

Yes, on the publicly available pages of

To be published on website: the website

Account Privacy Policy,

Cookie Policy,

Governance links to other standards

and policies:

DPIA, Data Retention Schedule,

DSP Toolkit (by 30th June every year)

Last Review Date: 09/05/2022

Review Cycle: Annual

Next Review Date: May 2023

1. Introduction

Egrist Limited policies provide a framework to help make sure that the data held and processed by us is managed with the appropriate standards to keep it safe.

Our privacy policies are concerned with the lawful collection of data and the rights of individuals, system users and data subjects.

This policy does not cover the data we collect from our clients once they are signed into their account: their usage of our system and the mental health assessment data they input. See <u>Account Privacy Policy</u> for this information.

This policy relates to any data collection from our *public* website or general customer contact:

- Email and contact information collected from the Contact Us section of the website.
- Email and contact information collected from direct correspondence phone, emails etc.
- Email addresses collected from the sign-up facility (for updates, newsletters etc.) on the website.

2. Privacy Policy

Egrist Limited ("we") are committed to protecting and respecting the privacy of our system's data subjects ("you") in accordance with the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018, which was amended to be read in conjunction with the UK GDPR. For the purpose of the Data Protection Act 2018 and this policy, the data controller is Egrist Limited, whose registered office is at The Anchor, Fore Street, Hartland, Bideford, England EX39 6BD.

This Privacy Policy provides an explanation as to what happens to any personal information that you provide to us, or that we collect from you, and your options regarding the ways in which your personal data is used. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By visiting our websites and web tools, you are accepting and consenting to the practices described in this policy. If you have any requests concerning your personal information or any queries with regard to our data processing practices, please contact us using our dedicated Privacy mailbox.

What data we collect

This Privacy Policy relates to general correspondence and data collection from the publicly accessible parts of our website.

Cookies

Cookies are files saved on your phone, tablet, computer or other device when you visit a website. We only use strictly necessary cookies and these ensure our websites work properly. They are therefore needed to support the technical functionality of our websites and cannot be turned off. These cookies do not store any personal identification information. We only uses session cookies, which delete themselves once you close your browser. For detailed information on the cookies we use and the purpose for which we use them, see our Cookie Policy.

From individuals or organisations who correspond with us by telephone, email or otherwise

You may give us personal information by corresponding with us directly or using our Contact Us facilities. The information you give us may include contact details such as your name, address, e-mail address and phone number. This data is collected to enable us to reply to your correspondence and maintain or develop our business relationship.

From individuals or organisations who sign up on our public website to receive further information

Our public website offers a sign up facility to request more information about our products in the form of regular updates and newsletters. When you provide your email address using this facility, it is stored in order to provide this service via email.

From individuals or organisations who log in to Egrist accounts

When you log in to Egrist through your own patient management system or the patient management system we provide, you are logging in to your Egrist account. By using your Egrist account, you are accepting the Egrist account Terms and Conditions, including the Egrist Account Privacy Policy. This Account Privacy Policy will apply while you are using services within your Egrist account.

Why we need your data

When we receive your correspondence, it is important to store your contact details in order to respond to you and follow up on any queries. We will also use this information with the hope of developing our business relationship.

When you sign up to our newsletters, we need your email address in order to send you the information you requested.

What we do with your data

When we receive your electronic correspondence, we store it on our secure email servers. We keep emails to ensure we adequately respond to and interact with our customers. We may add your contact details to our customer relationship information. We do not further process or share your contact details.

When we receive your email address through the facility on our website to sign up for further information, we add it to our mailing lists on our secure email servers. We then use our mailing lists to send important updates about our products and services. We do not further process or share your contact details.

How long we keep your data

Your correspondence is important to us for future contact and queries. We retain emails and email addresses if there exists a legitimate and ongoing business reason to preserve the information contained in the email. Staff are regularly reminded to review the emails they store and delete them if reviews highlight no ongoing business relationship or legitimate business reason.

The email address you input to our website requesting further information and updates will remain in our mailing lists until you ask us to delete it and unsubscribe. You can ask us to delete your email address at any time by writing to us using our dedicated <u>Privacy mailbox</u>. We will delete your email address as soon as we receive your request.

We do not share information

We do not share or sell any information collected from our public website. We do not use third-party services.

Your rights

All data subjects are entitled to know whether we hold information about them and, if we do, to have access to that information and request it to be deleted or corrected if it is inaccurate.

Under the Data Protection Act 2018, you have the right to find out what information we store about you. You have the right to:

- be informed about how your data is being used
- access personal data
- have incorrect or incomplete data updated
- have data erased in certain circumstances
- withdraw consent, stop or restrict the processing of your data in certain circumstances
- organise data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

Please note that we will make every effort to agree to and comply with all data requests. However, in some circumstances, we may consider there to be a valid reason to justify continued processing of your data. We would only be entitled to refuse to comply with your request under very specific circumstances. In the event that we refuse your request under these rights, we will provide you with a reason as to why and you have the right to complain. You can find out more about your rights under the UK's data protection laws at www.ico.org.uk.

If you wish to exercise any of these rights, please contact us using our dedicated <u>Privacy mailbox</u>. We will seek to deal with your request as soon as possible and at least within one calendar month (subject to any extensions to which we are lawfully entitled).

Updates to the Privacy Policy and Cookie Policy

We may review and amend the contents of this Privacy Policy from time to time, therefore we recommend you check it regularly.

Contact us

If you have questions regarding the contents of this policy or wish to exercise any of your rights described here, you can contact our Data Protection Officer:

By email: privacy@egrist.co.uk

If you feel we have not addressed your concerns satisfactorily, you have the right to lodge a complaint with the <u>Information Commissioner's Office (ICO)</u>.