

ORCA MEDICAL LIMITED PRIVACY NOTICE

ABOUT THIS NOTICE

Orca Medical Limited is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you in accordance with data protection law. Please read it carefully.

Data protection law says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

This notice is separated into the following sections for ease of use. If you have any questions about this notice or how we collect and use personal information about you please [contact us](#) [[Information About Us](#)]

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1. INFORMATION ABOUT US

- 1.1 Orca Medical Limited. Our registered office is at Future Space, University of west of England, Stoke Gifford, Bristol. Bs34 8RB and our registered company number is 10907715.
- 1.2 If you have any questions, our contact details are:
0117 4285774 Info@orcamedical.co.uk

2. WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

Personal data, or personal information, means any information about an individual who can be identified. It does not include data where an individual cannot be identified (anonymous data). We collect personal information from you in the following ways.

- 2.1 **Submitted online forms.** This is information about you (such as your name, address, email address, telephone number, professional background or details of your current practice, GMC or other professional registration numbers) that you give us when filling in forms whether on our website or offline. This could include, for example, forms which you complete to register for a course or sign-up for a newsletter.
- 2.2 **Content.** This is information about you which you provide when you post content on our website. This may include status updates, photographs, videos, blog posts, discussion board posts, survey responses and other content which you post on our website.
- 2.3 **Emails and records of other contact.** This is information you provide when you contact us (for example by email, post, or SMS) or when you respond to correspondence from us. This may include enquiries about our services or products, reviews, follow-up comments or complaints.
- 2.4 **Website technical information.** This is information about you which is collected via technical means such as cookies, webpage counters and other analytics tools.
- 2.5 **Caller information.** We may collect details of phone numbers used to call our organisation.
- 2.6 **Personnel information.** If you work for one of our customers, suppliers or business partners, the information we collect about you may include your contact information, details of your employment and our relationship with you.
- 2.7 **Information we receive from third parties.** As well as the information listed above, we may also receive the following types of personal information about you from the following sources:
 - 2.7.1 **Our service providers.** We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers) who may provide us with information about you.
 - 2.7.2 **Businesses we have bought.** If we have acquired another business, or substantially all of its assets, which originally held your information, we will hold and use the information you provided to them, or which they otherwise held about you, in accordance with this privacy notice.

3. HOW AND WHY DO WE USE YOUR INFORMATION?

- 3.1 **Common uses of your information**

We will only use your personal information when the law allows us to do so. Most commonly, we will use your personal information in the following circumstances:

 - 3.1.1 Where we need to perform a contract, we have entered into with you.
 - 3.1.2 Where we need to comply with a legal obligation.
 - 3.1.3 Where it is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests.
 - 3.1.4 We may also use your personal information where we need to protect your interests (or someone else's interests) or where it is needed in the public interest although these circumstances are likely to be rare.
- 3.2 **Specific examples** of ways in which we may use your personal information include:
 - 3.2.1 **Website administration.** We may use technical information, information about your visit to our website, cookie data, content and other information gathered from your participation in discussion boards or other functions on our website. We use this as necessary for our legitimate interests in administering our website and to ensure it operates effectively and securely.
 - 3.2.2 **Website advertising.** We, or third-party advertisers, may serve adverts on you.
 - 3.2.3 **Customer Administration.** We may use information about you including form information, content and other information you provide to us or which we collect about you as necessary to carry out our contracts with you to provide training and services, and for our legitimate interests in administering your account and any subscriptions we operate, as well as to review and improve our offerings, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
 - 3.2.4 **Direct Marketing.** We may send direct postal or electronic marketing to you using your contact details and information you have provided us. We use this as necessary for our legitimate interests in marketing to you and maintain a list of potential customers. If you are not acting as a business and have not provided your contact details directly to us in relation to our products, we will only send electronic marketing to you if you have consented to that marketing. We will

always provide an “opt-out” option on any marketing messages we send you. If you “opt-out” of our marketing materials, you will be added to our suppression list to ensure we do not accidentally send you further marketing.

3.2.5 **Third Party Direct Marketing.** We may share your contact details with third parties for them to send you direct marketing about their products and services. We will only do this if we have your consent to share your contact details with those specific third parties. If we do not have that consent, we will never share your contact details with third parties for them to send marketing to you.

3.2.6 **Third Party Personnel Administration.** If you work for one of our customers, suppliers or business partners, we may hold information on you. This includes information you provide when you correspond with us, as well as details of your employment, contact details, and our relationship with you. We use this as necessary for our legitimate interests in managing our relationship with your employer.

3.3 **If you fail to provide personal information**

If we have (or are entering into) a contract with you, and you fail to provide certain information when requested, we may not be able to perform (or enter into) that contract, or we may be prevented from complying with our legal obligations.

Where you book a course or training session with us, the following information must be provided as a requirement of your contract with us: your name, contact and booking details and your professional registration number. Failure to provide this will mean we are not able to fulfil our contract with you.

3.4 **Change of purpose**

We will only use your personal information for the purposes for which we collected it as set out in this notice, 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. SHARING YOUR INFORMATION

As well as any sharing listed in section 3 (How and why do we use your information) we may also share your information with third parties, including third-party service providers. We require third parties to respect the security of your personal information and to treat it in accordance with the law. We never sell your data to third parties unless we have your clear consent.

4.1 **Why might we share your personal information with third parties?**

If you want to take advantage of a discount with one of our third party partners because you have bought products or services from us, that third party may need to confirm with us that you have actually made a purchase. Where we receive a request for confirmation, we will share the minimum necessary information to verify that you are eligible for that discount.

We may otherwise share your personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our agreements with you, or to protect the rights, property, or safety of us, our customers, or others or where we have another legitimate interest in doing so. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4.2 **Which third-party service providers process your personal information?**

“Third parties” includes third-party service providers (including contractors and designated agents). Our payment processing is carried out by third parties, and we do not receive or hold any of your payment information. We also use third parties for the following business functions: user administration and IT services including website and database hosting.

4.3 **How secure is your information with third-party service providers?**

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them

to process your personal information for specified purposes and in accordance with our instructions.

4.4 **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

5. WHERE WE STORE YOUR INFORMATION

- 5.1 Our office headquarters are based in the UK and our main data centre is located in the UK. We do not anticipate ever needing to transfer your data outside of the UK, but if we do we will ensure that appropriate safeguards are in place.

6. DATA SECURITY

- 6.1 We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- 6.2 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 6.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.
- 6.4 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

7. HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

- 7.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 7.2 Details of our typical retention periods for different aspects of your personal information are set out below. If you would like details of our retention periods for a particular aspect of your personal information which is not detailed below, please contact us:
- 7.2.1 **Order Information** including information about you such as your name, address, email address, telephone number, products / services ordered, order date, course delivery date and other correspondence with us are kept for a period of up to 7 years after the date of order to enable us to deal with any after sales enquiries or claims.
- 7.2.2 **Contact Information** such as your name, email address and telephone number is kept for marketing purposes until you unsubscribe from our marketing, at which point your details will be added to our suppression list.
- 7.2.3 **Content** which you post on our website such as reviews, blog posts, discussion board posts, survey responses and other content is kept for as long as you have an account with us and may be retained indefinitely after you close your account. You are able to remove or delete any content which you post at any time while your account is active.
- 7.2.4 **Technical information** which is collected via technical means such as cookies, webpage counters and other analytics tools is kept for a period of up to 90 days.
- 7.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

8. YOUR RIGHTS

- 8.1 The law gives you a number of rights when it comes to personal information, we hold about you. The key rights are set out below. More information about your rights can be obtained from the Information Commissioner's Office (ICO) at <https://ico.org.uk/>. Under certain circumstances, by law you have the right to:

- 8.1.1 **Be informed** in a clear, transparent, and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.
- 8.1.2 **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.
- 8.1.3 **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.
- 8.1.4 **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 (for instance, we may need to continue using your personal data to comply with our legal obligations). 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).
- 8.1.5 **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 us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes.
- 8.1.6 **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.
- 8.1.7 **Request the transfer** of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
- 8.1.8 **Withdraw consent.** In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) 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 interest in doing so.
- 8.1.9 **Lodge a complaint.** If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in the UK, this will be the ICO).
If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, withdraw your consent to the processing of your personal information or request that we transfer a copy of your personal information to another party, please [contact us](#).
- 8.2 **Marketing Purposes**
In addition to the right set out above, you also have the right to ask us not to process your personal information for marketing purposes. We will usually inform you (before collecting your personal information) if we intend to use your personal information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal information. You can exercise the right at any time by [contacting us](#) in writing. You can also use the unsubscribe option in our marketing emails to unsubscribe from further marketing emails. Please note that where you unsubscribe from any postal marketing, you may initially still receive some content which has already been printed or sent, but we will remove you from any future campaigns.
- 8.3 **No fee usually required**
You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly

unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

8.4 **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

8.5 **Timescale**

Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

9. COOKIES

Our website (www.orcamedical.co.uk.co.uk) uses cookies.

9.1 **What are cookies?**

A cookie is an identifier (a small file of letters and numbers) that is sent to your computer. Our site's functionality will be limited if you configure your browser to reject cookies.

Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the site owner or others.

Session cookies are temporary cookies that remain in the cookie file of your browser only until your browser is closed. They allow websites to link your actions during a browser session.

Persistent cookies stay in the cookie file of your browser for longer (though how long will depend on the lifetime of the specific cookie).

For further information on cookies, including how to use your browser to block them and how to delete cookies already stored on your device, visit: www.allaboutcookies.org.

9.2 **How we use cookies**

9.2.1 **Session cookies.** We use session cookies to enable the website to keep track of your movement from page to page and store your selections, so you do not get asked repeatedly for the same information. These cookies allow you to proceed through many pages of the site quickly and easily without having to authenticate or reprocess each new area you visit.

9.2.2 **Google Analytics ("GA") cookies.** Google sets persistent cookies (up to two years) to recognise and count the number of site visitors as well as providing other information about the visit such as duration, route through the site and what sites the visitor came from. This information helps us to improve the way our site works, for example by making sure users find what they need easily.

9.2.3 **Cookie warning cookie:** This cookie takes note of whether you are happy to accept cookies on this website based on your response to the message which appeared when you first visited the site. This persistent cookie will remember your preference for as long as it remains on your system.

10. THIRD PARTY WEBSITES

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

11. CHANGES TO THIS PRIVACY NOTICE

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice.