

## PRIVACY POLICY

<b>Document name:</b>	<b>Privacy Policy</b>
<b>Document Classification:</b>	General
<b>Document No:</b>	PP001
<b>Version:</b>	2.0
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<b>Policy Reviewer</b>	<b>Lorraine Gallier</b>
<b>Date created</b>	November 2020
<b>Review Date</b>	22 <sup>nd</sup> April 2021
<b>Responsible committee:</b>	Operational Committee
<b>Superseded policy (if applicable):</b>	1.0
<b>Target audience:</b>	Directors, Managers, Clinicians, Staff
<b>Other relevant policies</b>	<ul style="list-style-type: none"><li>• Agency Worker Handbook</li><li>• Quality Assurance and Monitoring Policy</li><li>• Grievance &amp; Disciplinary Procedure</li><li>• Confidentiality Policy</li><li>• Data Protection Policy</li></ul>

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## 1.0 INTRODUCTION

SOS Medical understand that your personal information is very important to you.

When you visit our website and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important.

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

## 2.0 AIMS

The purpose of this statement is to explain how we may use the information we obtain about you.

## 3.0 SCOPE

This policy applies to all staff of SOS Medical including employees, temporary workers, contractors and sub-contractors, and service users.

## 4.0 DEFINITIONS

### **Person-identifiable information:**

Is anything that contains the means to identify a person, e.g. name, address, postcode, date of birth, NHS number and must not be stored on removable media.

It can take many forms including patient level health information, employee records, occupational health records, etc.

**Non-identifiable information** can also be classed as confidential such as confidential business information e.g. financial reports; commercially sensitive information e.g. contracts, trade secrets, procurement information, which should also be treated with the same degree of care.

## 5.0 WHAT INFORMATION DO WE COLLECT?

SOS Medical collect personal information that you disclose to us including:

Name, address, contact information, payment information and your personal documents.

We collect personal information that you voluntarily provide to us when registering on the SOS Medical Website, expressing an interest in obtaining information about us or our products and services, when participating in activities on the site, or contacting us.

The personal information that we collect depends on the context of your interactions with us and the products and features you use. The personal information we collect can include the following:

**Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, and other similar contact data.

**Payment Data.** We collect data necessary to process your payments for work undertaken on behalf of SOS Medical.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information automatically collected:

Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our websites.



We automatically collect certain information when you visit, use or navigate the SOS Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

## **6.0 HOW DO WE USE YOUR INFORMATION?**

We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests (“Business Purposes”), in order to enter into or perform a contract with you (“Contractual”), with your consent (“Consent”), and/or for compliance with our legal obligations (“Legal Reasons”). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

To send you promotional communications for Business Purposes, for example SOS Medical Monthly Newsletter.

We may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the “Your Privacy Rights” below).

To send administrative information to you for Business Purposes, Legal Reasons and/or possibly Contractual.

We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

To post testimonials [with your Consent]. We post testimonials on our Sites that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at [admin@sosmedical.co.uk](mailto:admin@sosmedical.co.uk) and be sure to include your name, testimonial location, and contact information.

Request Feedback for our Business Purposes and/or with your Consent. We may use your information to request feedback and to contact you about your use of our website.

To protect our Sites for Business Purposes and/or Legal Reasons. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).

To enforce our terms, conditions and policies for Business Purposes, Legal Reasons and/or possibly Contractual.



For other Business Purposes.

We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our website, products, services, marketing and your experience.

## **7.0 WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We only share and disclose your information in the following situations:

**Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

**Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

**Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

**Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

**With your Consent.** We may disclose your personal information for any other purpose with your consent.

## **8.0 DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

For a full list of what we use information for, please see the previous sections titled “Use of Your Information” and “Disclosure of Your Information.”

## **9.0 HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

If you choose to register or log in to our websites using a social media account, we may have access to certain information about you.

We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the website. Please note that we do not control, and are not responsible for, other uses of your personal information by your third party social media provider.



We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

#### **10.0 IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

We may transfer, store, and process your information in countries other than your own. Our servers are located in Scotland, Wales, England and Northern Ireland.

If you are accessing our Sites from outside these areas, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see “Disclosure of Your Information” above), in England Scotland Wales and Northern Ireland.

If you are a resident in the European Economic Area, then these countries may not have data protection or other laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law.

#### **11.0 WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?**

We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.

The Sites may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Sites. You should review the policies of such third parties and contact them directly to respond to your questions.

#### **12.0 HOW LONG DO WE KEEP YOUR INFORMATION?**

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

No purpose in this policy will require us keeping your personal information for longer than 8 years from the last entry on your employment file.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### **13.0 HOW DO WE KEEP YOUR INFORMATION SAFE?**

We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

### **14.0 DO WE COLLECT INFORMATION FROM MINORS?**

We do not knowingly collect data from or market to children under 18 years of age. We do not knowingly solicit data from or market to children under 18 years of age. By using the SOS Medical website, you represent that you are at least 18. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [info@sosmedical.co.uk](mailto:info@sosmedical.co.uk)

### **15.0 WHAT ARE YOUR PRIVACY RIGHTS?**

In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information.] You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right

- (i) to request access and obtain a copy of your personal information,
- (ii) to request rectification or erasure;
- (iii) to restrict the processing of your personal information; and
- (iv) if applicable, to data portability.
- (v) In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below [info@sosmedical.co.uk](mailto:info@sosmedical.co.uk). We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

Cookies and similar technologies:

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies.

### **16.0 DO WE MAKE UPDATES TO THIS POLICY?**

Yes, we will update this policy as necessary to stay compliant with relevant laws.



We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

#### **17.0 HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, email us at [info@sosmedical.co.uk](mailto:info@sosmedical.co.uk)

If you have any further questions or comments about us or our policies, email us at [info@sosmedical.co.uk](mailto:info@sosmedical.co.uk)