
PRIVACY POLICY

**INNOVATE HEALTHCARE
MANAGEMENT GROUP LIMITED**

Contents

<u>1.</u>	<u>IMPORTANT INFORMATION AND WHO WE ARE</u>	<u>2</u>
<u>2.</u>	<u>The data we collect about you</u>	<u>3</u>
<u>3.</u>	<u>How is your personal data collected?</u>	<u>5</u>
<u>4.</u>	<u>How we use your personal data</u>	<u>5</u>
<u>5.</u>	<u>Disclosures of your personal data</u>	<u>9</u>
<u>6.</u>	<u>International transfers</u>	<u>10</u>
<u>7.</u>	<u>Data security</u>	<u>10</u>
<u>8.</u>	<u>Data retention</u>	<u>10</u>
<u>9.</u>	<u>Your legal rights</u>	<u>11</u>
<u>10.</u>	<u>Glossary</u>	<u>12</u>

Introduction

Welcome to the Innovate Healthcare Management Group Limited's privacy notice.

Innovate Healthcare Management Group Limited (“**Innovate**”) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary (at the end of this document to understand the meaning of some of the terms used in this privacy notice.

IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

- This privacy notice aims to give you information on how Innovate collects and processes your personal data through your use of our services, including all data you may provide to us through this website when you use and/or purchase a product or service from or via us. This website is not intended for children and we do not knowingly collect data relating to children.
- It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.
- This privacy notice is issued on behalf of Innovate, so when we mention "Innovate", "we", "us" or "our" in this privacy notice, we are referring to Innovate who are responsible for processing your data. We or the Referring Party will let you know which entity will be the controller for your data when you purchase or use a product or service with, from or with us. However, in providing our services to you we at Innovate act as a data controller and/or a data processor and we are responsible for your personal data.
- We have appointed a data protection officer (DPO) who is responsible for overseeing any questions or enquiries in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

Contact details

Our full details are:

Innovate Healthcare Management Group Limited

Name of DPO: Jessica Tredrea

Email address: Data.Requests@innovatehmg.co.uk

Postal address: Third Floor, Dale House, Tiviot Dale, Stockport SK1 1TA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

- Changes to the privacy notice and your duty to inform us of changes

Please note this version was last updated on 16th November 2023 and historic versions can be obtained by contacting us. The data protection law in the UK changed on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, it is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

- **Personal data**, or personal information, means any information about you as an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
- **Identity Data includes** first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data includes** address, delivery address, email address and telephone numbers.
- **Transaction Data includes** details of products and services you have purchased or used from or via us or your Referring Party and details of any related insurance products.
- **Technical Data includes** [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions,

operating system and platform and other technology on the devices you use to access this website].

- **Profile Data includes** your username and any reference numbers relevant to you, details of the services you have made use of from us or a Referring Party made by your interests, preferences, feedback and any survey responses.
- **Usage Data includes** information about how you use our products and services.
- **Marketing and Communications Data includes** your preferences in receiving marketing and communications from us and our third parties including Treatment Providers and any Referring Party and your communication preferences.
- **We also collect, use and share Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.
- **We do collect Special Categories of Personal Data about you** (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, trade union membership, details of medical treatment, information about your health and genetic and biometric data).
- Please note we do not collect any information about criminal convictions and offences.
- **If you fail to provide personal data** where we need to collect personal data by law, or under the terms of a contract we have with you, a Treatment Provider and/or a Referring Party and you fail to provide that data when requested, we may not be able to perform the services we aim to deliver to you under that contract. In this case, we

may have to cancel a product or service you have with or via us, the Treatment Provider and/or Referring Party; we will however notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your identity, contact and medical data by filling in forms or by corresponding with us by face-to-face discussions, telephone discussions, post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- make use of our products and services;
- subscribe to our service or publications;
- request marketing to be sent to you;
- provide us from time to time with details and information relating to your health, injury, disease condition, progress and/or feedback.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

Personal Data from the following parties:

- Panel Treatment Providers
- Our Referring Parties (your employer, insurance policy provider, solicitor)
- The NHS
- Other private healthcare providers
- Government agencies or providers

How we use your personal data

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

- 1 Where we need to perform the contract we are about to enter into or have entered into with you or your Referring Party.
- 2 To provide products and services to you.
- 3 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- 4 Where we need to comply with a legal or regulatory obligation.

Click [[here](#)] to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

<p>We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below. Purpose/Activity</p>	<p>Type of data</p>	<p>Lawful basis for processing including basis of legitimate interest</p>
<p>To register you as a client/patient</p>	<p>(a) Identity (b) Contact (c) Medical Information</p>	<p>Performance of a contract with you or your Referring Party</p>

<p>To process and deliver our services to you including:</p> <p>(a) to enable us to identify what services you need, how we can deliver them to you, to obtain feedback to enable us to notify you and your Referring Party as to details of any ongoing and/or additional services required by you.</p> <p>(b) to understand your needs and fulfil our duties to you.</p> <p>(C)Manage payments, fees and charges</p> <p>(d) Collect and recover money owed to us</p> <p>(e) [other]</p> <p>(f) to deliver our rehabilitation or occupational health services to you, either through our own services, or those of our panel treatment providers.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p> <p>(f) Medical Information</p>	<p>(a) Performance of a contract with you or your Referring Party</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>

<p>To enable you to complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and other information to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. In general, we only rely on consent as a legal basis for processing your personal data in relation to sending direct marketing communications to you via email or text message. **You have the right to withdraw your consent** at any time. Where consent is the only legal basis for processing, we will cease to process data after your consent is withdrawn:

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the [*Glossary*].
- External Third Parties as set out in the [*Glossary*].
- Specific third parties listed in the table in paragraph 6
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with

them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and

whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

By law we have to keep information about our Clients (including Contact, Identity, Medical, Financial and Transaction Data) for at least 7 years after they cease being clients for tax, regulatory and/or legal purposes.

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us; no fee is usually required.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no

right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

LAWFUL BASIS

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our

legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or are a beneficiary of or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

EXTERNAL THIRD PARTIES

- Panel Treatment Providers acting as processors or joint controllers based in the United Kingdom who provide medical and/or health services and/or system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, medical, advisory, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Referring Party, this may be your employer, solicitor, insurance policy provider, other rehabilitation provider or Government agency or provider.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us



to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.