

Privacy Policy

Last updated: 23/05/2018

Your privacy is extremely important to us so we want you to know exactly what kind of information we collect about you and how we use it.

We've set out all the details below.

Please take the time to read and understand this policy.

About Us

We are Orr Medical Training.

We are the 'data controller' of the information you provide us with, which means we control the way information is used and processed.

How we collect your personal information?

Direct interactions

You may give us your Identity, Contact, Special Category and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- pay for training and services;
- speak to or contact us;
- ordering our products or services;
- create an account on our websites;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us some feedback;
- by filling in forms, for example when you sign up to offers, news or a competition;
- by sending us emails and text messages (SMS or MMS);
- by adding posts, reviews and other comments to any of our websites, mobile apps or other community forums;
- by liking or disliking our offers and promotions;
- by interacting with us on social media platforms such as Facebook or Twitter etc;
- by talking to us at an event or over the telephone. For example, when enquiring about a course or making a complaint;

Automated technologies or interactions.

As you interact with our website(s), we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

Your Personal Data

We may collect, store, and use the following categories of personal information about you:

Identity Data

Title, first name, last name, username or similar identifier, date of birth and gender.

Contact Data

Billing address, delivery address, email address and telephone numbers.

Financial Data

Bank account and payment card details.

Transaction Data

Details about payments to and from you and other details of products and services you have purchased from us. These include:

- the time and date of purchase;
- any relevant delivery address;
- any promotional vouchers codes or other alternative means of payment you may use, as well as relevant payment cards such as a credit or debit card.

Technical Data

- Internet protocol (IP) address;
- MAC address;
- IMEI number from your phone;
- your login data;
- browser type and version;
- time zone setting and location;
- browser plug-in types and versions;
- device model;
- device name;
- operating system and platform and other technology on the devices you use to access this website;
- information where you came to our site from, and where you went when you left it.
- information when you use our in-store WIFI networks to access the internet which includes the time and geographic location of your device when you do so;
- We also track how often you visit and use our websites and mobile apps. We do this via email and website cookies and similar tracking technology built into our mobile apps. We make cookie policies available on each of our websites to give you more detailed information on how we use them.

Profile Data

- your username and password;
- purchases or orders made by you;
- your interests, preferences, feedback and survey responses;

Usage Data

- Information about how you use our website, products and services;
- Information on what you view, click on access by way of our marketing emails and text messages (SMS, MMS), website and mobile.

Marketing and Communications Data

Your preferences in receiving marketing from us, our third parties, and your communication preferences.

Aggregated Data (sometimes referred to a pseudonymised data)

We also collect, use and share Aggregated Data (sometimes referred to a pseudonymised 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.

How we will use information about you?

We will only use your personal information when the law allows us to. We will use your personal information in the following circumstances:

- When you consent to us doing so;
- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation;
- 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.

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).

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests);
- Where it is needed in the public interest or for official purposes.

Purpose/ activity, type of data and lawful basis for processing

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.

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.

Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Your consent (c) Necessary for our legitimate interest to set up and manage your account
To process and deliver your service including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to fulfil your order or recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Responding to your queries and comments, social media posts and questions.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services) (d) Your consent
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)

To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics gathered from our website, mobile apps and events to improve our website, products/services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
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)
To power our security measures and services in order to protect you and our business	(a) Identity (b) Technical (c) Usage	Necessary for our legitimate interest so you can safely access our website.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

If you have expressly opted-in to receive marketing from us we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Orr Medical group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time through our website or by contacting us at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal information 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 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.

Disclosure of Personal Data

On occasion we may have to share your personal data with the parties set out below for the purposes set out.

External Third Parties

- **Service providers:** acting as processors based within the EEA who provide IT and system administration services.
- **Professional advisers:** acting as processors or joint controllers including lawyers, bankers, auditors and insurers based within the EEA who provide consultancy, banking, legal, insurance and professional service providers.
- **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.
- **Other people who help us provide our websites, mobile apps, WIFI networks, and related services to you:** They include information technology experts who design and host our websites, and payment services companies that make it easy for you to use your credit or payment cards with us. Other examples include market research companies, marketing, advertising, design and PR organisations and general service companies such as printers, mailing houses and form-scanning service providers.
- **Credit reference agencies:** who supply anti-fraud and credit-insight information to us, central and local government departments such as the Driver Vehicle Licence Agency (DVLA) and local authorities who run the UK

electoral rolls, banks and finance companies that also provide anti-fraud services, and customer insight companies. Where anti-fraud is concerned, the organisations concerned may hold your information on file for future anti-fraud-prevention purposes.

- **With social media companies such as Facebook and Twitter:** and our advertising partners to enable us to run targeted promotions for you on their platforms;
- **Any new business partners:** we may have over time, for example, in the event of a joint venture, reorganisation, business merger or sale that affects us.
- **The Police, local authorities, Her Majesty's Revenue and Customs (HMRC), the courts and any other government authority:** if they ask us to do so (but only if us doing so is lawful).
- **Other people who make a 'subject access request':** where we are required to do so by law.
- **We may also share the information we collect where we are legally obliged to do so, e.g. to comply with a court order.**
- **Social media, blogs, reviews, etc.**
- **Any social media posts or comments you send to us:** will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they're written, and could be made public. Other people, not us, control these platforms. We're not responsible for this kind of sharing. Before you make any remarks or observations about anything, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you'll understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you're unhappy about it. It's worth remembering too that any blog, review or other posts or comments you make about us, our products and services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large. You should take extra care to ensure that any comments you make on these services, and on social media in general are fit to be read by the public, and are not offensive, insulting or defamatory. Ultimately, you are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.
- **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.

Data Security

A lot of the information we receive reaches us electronically, originating from your devices, and is then transmitted by your relevant telecoms network provider.

Where it's within our control, we put measures in place to ensure this 'in flight' data is as secure as it possibly can be.

Once it arrives at Orr Medical, you can be sure we take the security of your information very seriously.

We use secure means to communicate with you where appropriate, such as 'https' and other security and encryption protocols.

If you have any concerns about the security of your own personal computers and mobile devices, we suggest you read the advice of 'Get Safe Online'.

How long do we keep your information for?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it for in the first place.

In most cases, this means we will keep your information for as long as you continue to use our services, and for a period of time afterwards if you stop doing so just in case you begin use our services again.

After that we will either delete it or anonymise it so that it cannot be linked back to you.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax 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.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes by keeping your details up to date.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **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.

- **No fee 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 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.
- **Request access:** Of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. We may need to verify the accuracy of any new data you provide to us.
- **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. 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), 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 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 processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which means we can continue to process your personal information.
- **Request the restriction of processing:** Of your personal information. 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 information to another 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.

- **Right to 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.

Fees for excessive or unreasonable requests

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

Data Protection Officer

The Data Protection Officer (DPO) oversees compliance with this privacy notice. If you have any questions or concerns about this Privacy Notice or how we handle your personal information, please contact the DPO at admin@orrmedicaltraining.co.uk . You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) <https://ico.org.uk/> , the UK supervisory authority for data protection issues.

Changes to this privacy policy

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this Privacy Policy, please contact admin@orrmedicaltraining.co.uk .

Cookie Policy for Orr Medical Training

This is the Cookie Policy for Orr Medical Training, accessible from www.orrmedicaltraining.co.uk

What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

For more general information on cookies see the Wikipedia article on HTTP Cookies.

How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

The Cookies We Set

- Site preferences cookies

In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may anonymously track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

More Information

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

However, if you are still looking for more information then you can contact us through one of our preferred contact methods:

- Email: admin@orrmedicatraining.co.uk