**Website Privacy Notice**

This is the privacy notice of East Midlands Spine Limited.

In this document, "we", "our", or "us" refer to East Midlands Spine Limited.

We are company number 11466222 registered in England

Our registered office is at 1st Floor, Healthaid House, Marlborough Hill, Harrow,

Middlesex HA1 1UD

**Introduction**

This privacy notice aims to inform you about how we collect and process any

information that we collect from you, or that you provide to us. It covers information

that could identify you (“personal information”) and information that could not. In the

context of the law and this notice, “process” means collect, store, transfer, use or

otherwise act on information. It tells you about your privacy rights and how the law

protects you.

We are committed to protecting your privacy and the confidentiality of your personal

information. Our policy is not just an exercise in complying with the law, but a

continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and

hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly

incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard

to the processing and control of your personal data. We do this now, by requesting

that you read the information provided at http://www.knowyourprivacyrights.org

Except as set out below, we do not share, or sell, or disclose to a third party, any

information collected through our website.

**1. Data Protection Officer**

We have appointed a data protection officer (DPO) who is responsible for

ensuring that our policy is followed.

If you have any questions about this privacy notice, including any requests to

exercise your legal rights, please contact our DPO, Sam Alexander at

eastmidlandsspineltd@gmail.com.

**2. Data we process**

We may collect, use, store and transfer different kinds of personal data about

you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of

birth, and other identifiers that you may have provided at some time.

Your contact information includes information such as billing address, delivery

address, email address, telephone numbers and any other information you

have given to us for the purpose of communication or meeting.

Technical data includes your internet protocol (IP) address, 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.

Marketing data includes your preferences in receiving marketing from us;

communication preferences; responses and actions in relation to your use of

our services.

We may aggregate anonymous data such as statistical or demographic data

for any purpose. Anonymous data is data that does not identify you as an

individual. Aggregated data may be derived from your personal data but is not

considered personal information in law because it does not reveal your

identity.

For example, we may aggregate profile data to assess interest in a product or

service.

However, if we combine or connect aggregated data with your personal

information so that it can identify you in any way, we treat the combined data

as personal information and it will be used in accordance with this privacy

notice.

**3. Special personal information**

Special personal information is data about your race or ethnicity, religious or

philosophical beliefs, sex life, sexual orientation, political opinions, trade union

membership, information about your health and genetic and biometric data.

We may collect special personal information about you if there is a lawful

basis on which to do so.

**4. If you do not provide personal information we need**

Where we need to collect personal data by law, or under the terms of a

contract we have with you, and you fail to provide that data when requested,

we may not be able to perform that contract. In that case, we may have to

stop providing a service to you. If so, we will notify you of this at the time.

**The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process

different categories of your personal information, and to notify you of the basis for

each category.

If a basis on which we process your personal information is no longer relevant then

we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of

any new basis under which we have determined that we can continue to process

your information.

**5. Information we process because we have a**

**contractual obligation with you**

When you buy a product or service from us, or otherwise agree to our terms

and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the

information you give us. Some of this information may be personal

information.

We may use it in order to:

• verify your identity for security purposes

• sell services to you

• provide you with our services

• provide you with suggestions and advice on products, services and

how to obtain the most from using our website

We process this information on the basis there is a contract between us, or

that you have requested we use the information before we enter into a legal

contract.

We shall continue to process this information until the contract between us

ends or is terminated by either party under the terms of the contract.

**6. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship

between us, such as when you browse our website or ask us to provide you

more information about our business, our products and services, you provide

your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this

information, for example, by asking you to agree to our use of cookies.

If you have given us explicit permission to do so, we may from time to time

pass your name and contact information to selected associates whom we

consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your

consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us

eastmidlandsspineltd@gmail.com. However, if you do so, you may not be able to use

our website or our services further.

**7. Information we process for the purposes of legitimate**

**interests**

We may process information on the basis there is a legitimate interest, either

to you or to us, of doing so.

Where we process your information on this basis, we do after having given

careful consideration to:

• whether the same objective could be achieved through other means

• whether processing (or not processing) might cause you harm

• whether you would expect us to process your data, and whether you

would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

• record-keeping for the proper and necessary administration of

East Midlands Spine Limited

• responding to unsolicited communication from you to which we believe

you would expect a response

• protecting and asserting the legal rights of any party

• insuring against or obtaining professional advice that is required to

manage East Midlands Spine Limited risk

• protecting your interests where we believe we have a duty to do so

**8. Information we process because we have a legal**

**obligation**

Sometimes, we must process your information in order to comply with a

statutory obligation.

For example, we may be required to give information to legal authorities if

they so request or if they have the proper authorisation such as a search

warrant or court order.

This may include your personal information.

**Specific uses of information you provide to us**

**9. Complaints regarding content on our website**

Our website is a publishing medium.

If you complain about any of the content on our website, we shall investigate

your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall

remove the content while we investigate.

**10. Communicating with us**

When you contact us, whether by telephone, through our website or by e-mail,

we collect the data you have given to us in order to reply with the information

you need.

We record your request and our reply in order to increase the efficiency of

East Midlands Spine Limited

We keep personally identifiable information associated with your message,

such as your name and email address so as to be able to track our

communications with you to provide a high quality service.

**11. Complaining**

When we receive a complaint, we record all the information you have given to

us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we

may decide to give to that other person some of the information contained in

your complaint. We do this as infrequently as possible, but it is a matter for

our sole discretion as to whether we do give information, and if we do, what

that information is.

We may also compile statistics showing information obtained from this source

to assess the level of service we provide, but not in a way that could identify

you or any other person.

**Use of information we collect through automated systems**

**when you visit our website**

**12. Cookies**

Cookies are small text files that are placed on your computer's hard drive by

your web browser when you visit any website. They allow information

gathered on one web page to be stored until it is needed for use on another,

allowing a website to provide you with a personalised experience and the

website owner with statistics about how you use the website so that it can be

improved.

Some cookies may last for a defined period of time, such as one day or until

you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should

allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our

servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use

cookies. If you choose not to accept them, we shall not use them for your visit

except to record that you have not consented to their use for any other

purpose.

If you choose not to use cookies or you prevent their use through your

browser settings, you will not be able to use all the functionality of our

website.

We use cookies in the following ways:

• to track how you use our website

• to record whether you have seen specific messages we display on our

website

• to record the conversation thread during a live chat with our support

team

[We provide more information about the cookies we use in our cookie policy].

**13. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other

content on our website are recorded.

We record information such as your geographical location, your Internet

service provider and your IP address. We also record information about the

software you are using to browse our website, such as the type of computer

or device and the screen resolution.

We use this information in aggregate to assess the popularity of the

webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits,

the data possibly could be used to identify you personally, even if you are not

signed in to our website.

**Disclosure and sharing of your information**

**14. Credit reference**

To assist in combating fraud, we share information with credit reference

agencies, so far as it relates to clients or customers who instruct their credit

card issuer to cancel payment to us without having first provided an

acceptable reason to us and given us the opportunity to refund their money.

**Control over your own information**

**15. Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and

current. Please keep us informed if your personal data changes.

**16. Access to your personal information**

At any time you may review or update personally identifiable information that

we hold about you.

To obtain a copy of any information that is not provided on our website you

should contact us to make that request.

After receiving the request, we will tell you when we expect to provide you

with the information, and whether we require any fee for providing it to you.

**Other matters**

**17. Use of site by children**

We do not sell products or provide services for purchase by children, nor do

we market to children.

If you are under 18, you may use our website only with consent from a parent

or guardian

**18. How you can complain**

If you are not happy with our privacy policy or if you have any complaint then

you should tell us.

If a dispute is not settled, then we hope you will agree to attempt to resolve it

by engaging in good faith with us in a process of mediation or arbitration.

**19. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal

information only for as long as required by us:

• to provide you with the services you have requested;

• to comply with other law, including for the period demanded by our tax

authorities;

• to support a claim or defence in court.

**20. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every

country or legal jurisdiction in which we aim to do business. If you think it fails

to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our

website.

**21. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms

that apply to you are those posted here on our website on the day you use our

website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.