# Cognivate Privacy Policy

We are committed to ensuring that your information is secure.

## How do we store your data?

In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

We will ensure that all members of our team take the necessary steps to protect the personal data they hold against accidental loss or unauthorised access.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Cognivate will review stored personal data once yearly, whether held digitally or on paper, to decide whether to destroy or digitally delete any personal data once the purpose for which that data was collected is no longer relevant.

We will automatically delete data after 5 years from when it was originally processed unless there is a compelling reason not to do so (e.g. keeping important medical records, keeping in contact with customers etc.)

#### What data do we collect?

We may collect and store:

- Basic contact information (name, date of birth, telephone numbers and address),
- Medically relevant details including our clients current and past medical history, medication, your GP, the findings from our assessment, your treatment records and your goals for the future
- Associated, relevant information that we receive from other healthcare professionals, as part of your ongoing care.
- Payment details
- Usage data and information uploaded to our service, together with information related to your usage of our service, any web pages you visit, the times and lengths of visits and any interactions you have with the web pages.

We process the data because it is in our legitimate interests as expert clinicians to do so.

We also process personal data pursuant to our legitimate interests in running our business such as:

- Invoices and receipts
- Accounts, VAT and tax returns

- Personal details, including bank details of our associates
- CVs of prospective candidates

# How do we collect your data?

You directly provide Cognivate with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback via our website or via email
- Use or view our website via your browser's cookies
- Email us
- Instruct us to provide our service
- Authorise third parties acting on your behalf to share your data with us

## How will we use your data?

The information we collect is used so we can:

- Respond to enquiries about our products and services
- Email you with information about our products and services
- Ensure that we provide you with the best and most appropriate treatment / management
- Get in touch with you, arrange appointments and to send invoices
- Collect payments
- Understand how people use our website so that we can make it more intuitive

You have the right at any time to stop Cognivate from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please click here

From time to time, we will need to liaise with other professionals involved with your care, such as your GP, hospital consultant, orthotist or other members of the multidisciplinary team.

We will only do this with your consent and when it is necessary to your physiotherapy treatment / management.

#### Special category data

Special category data is personal data which the GDPR says is more sensitive, and so needs more protection. For example information about an individuals:

- race
- ethnic origin
- health
- sex life or
- sexual orientation

We may process this information for the purposes of medical diagnosis, provision of health treatment and management of the health of our patients and the community we serve.

Our healthcare professionals who provide you with care maintain records about your health and any treatment or care you have received previously. These records are used to help to provide you with the best possible healthcare.

Healthcare records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Records we hold about you may include the following information;

Details about you, such as your name, address, carers, legal representatives and emergency contact details

- Any contact the Surgery has had with you, such as appointments, clinic visits, emergency appointments, etc.
- Notes and reports about your health
- Details about your treatment and care
- Results of investigations such as laboratory tests, x-rays, etc.
- Relevant information from other Healthcare Professionals, relatives or those who care for you.

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Whenever necessary, we take strict measures to ensure that individual patients cannot be identified.

#### Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org.

### How do we use cookies?

Cognivate uses cookies in a range of ways to improve your experience on our website, including:

- Understanding how you use our website
- Promote relevant content to you whilst you are on our website

#### What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

Functionality – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

Advertising – Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

# How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

# Sharing and disclosure of your information

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Financial transactions relating to our website and services are handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

From time to time we may need to share your personal data with selected professionals, partners, suppliers and sub-contractors that help us provide our service to you. These providers will be given access to your personal data only as is critically necessary to provide our service (for example, to provide analytics on website activities or deliver email newsletter). They will only be provided with any personal data to enable them to provide such services and not for any other purpose.

We maintain GDPR-compliant data processing agreements and ensure that we have adequate safeguards in place with all of our third party providers with whom we share personal data. We remain responsible for how such third party providers use the personal data we share with them

#### Privacy policies of other websites

The Cognivate website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

#### Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 25 January 2021.

# The Rights of an Individual

Under the Regulations an individual has the following rights with regard to those who are processing their data:

- Data cannot be used for the purposes of direct marketing of any goods or services if the client has declined their consent to do so.
- Individuals have a right to have their data erased and to prevent processing in specific circumstances:
- Where data is no longer necessary in relation to the purpose for which it was originally collected
- When an individual withdraws consent
- When an individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- Personal data was unlawfully processed
- An individual has a right to restrict processing
- Clients can ask, in writing to the data controller, to see all personal data held on them, including e-mails and computer or paper files. The data controller must comply with such requests within 30 days of receipt of the written request.

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Our data protection officer is Lydia Storr-Meddings, you can contact her at: Email: dpo@cognivaterehab.com Telephone: 07709188929

If you want to request access to the information that we hold about you, please email: <a href="mailto:dpo@cognivaterehab.com">dpo@cognivaterehab.com</a>

#### How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Phone number: 0303 123 1113

Online live chat: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a>