



Document Title:	DOT MEDICAL HUMAN RESOURCE POLICY GDPR Privacy Policy	Issue Date:		30 Apr 2024
		Revision N°:		0
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DOT MEDICAL LIMITED PRIVACY NOTICE.

1. IMPORTANT INFORMATION AND WHO WE ARE

What Is the Purpose of This Document?

Dot Medical Limited is committed to protecting the privacy and security of your personal information. This privacy notice aims to give you information on how Dot Medical Limited collects and processes your personal data through your use of our website and during and after the supply of products or use of any of the services provided by us.

This notice applies to anyone who is an employee or anyone that uses our website or who buys or uses any of our products and / or services. We may update this notice at any time.

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.

Controller

Dot Medical Limited (**Company Number:3485201**) whose Registered Office is at **Josolyne's, Merchant Exchange, Waters Green, Macclesfield, SK11 6JX** and whose Trading Office is at **Silk Point, Queens Ave Macclesfield, Cheshire Sk10 2BB** is the controller and responsible for your personal data. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

2. INFORMATION WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The personal information we collect about you will depend on the products and services you use and subscribe to.

We will collect, store, and use the following categories of personal information about you as follows:

- **Identity Data** including personal contact details such as name and title.
- **Contact Data** including addresses, telephone numbers, and personal email addresses.
- **Financial Data** including bank account details, your debit or credit card information, and other banking information, for a payroll purpose.
- **Transaction Data** including your billing history and products and services you use and anything else relating your account.
- **Profile Data** including information you provide to us in your communications with us, information you provide to us when participate in your surveys or data information requests.
- **Marketing and Communications Data** including your preferences in receiving marketing from us or your communication preferences.

We may also collect **technical data** and information on how you use our products and services, including:



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- Your activity on our products.
- The date, time, of your communications including your phone number name and at the time these communications are made.
- The phone numbers that you call and send messages to (and the phone numbers that you receive calls and messages from).
- Your phone or device usage of employees, and your employee phone records or data usage at any given time.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We may hold information about your health only for the purposes of an intended treatment provided by your physician.

Failure to Provide Personal Data for any reason results in the following.

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 the contract we have or are trying to enter with you (for example, to provide you with products or payroll services). In this case, we may have to cancel a product or our services you have with us, but we will notify you if this is the case at the time.

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.

3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about you through:

- **Direct interactions.** You may give us your Identity, Contact, Financial and Transaction Data when you are employed and go through Dot Medical Limited Induction process, or when you as a customer purchase our products and services and during the sales process.
- **Third parties or publicly available sources.** We may sometimes receive personal data and additional information from third parties including medical professionals, credit reference agencies or other background check agencies; our partners; and business directories, for banking credit and discount purposes for our customers.

We will collect additional personal information while performing our contract with you and in providing our products and services to you throughout the period of your contract with us.

4. USING INFORMATION ABOUT YOU

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

- Where we need to perform the contract, we have entered with you or your physician.
- Where we need to comply with a legal obligation.
- Where we have your consent.



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To validate you as a registered customer when using our services and calling our customer services.	(a) Identity (b) Contact	(a) Performance of a contract with you.
To notify you about changes to our services and 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) Profile	(a) Necessary for our legitimate interests (to develop our products/services and grow our business).
For the administration of files and records; business management And planning, including accounting and auditing.	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services). (b) Necessary to comply with a legal obligation.
To prevent fraud.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical	(a) Necessary for our legitimate Interests (to prevent fraud). (b) Necessary to comply with a legal obligation
To send certain communications (including by email and SMS) to you including service announcements and administrative messages and other communications relating to our services.	(a) Identity (b) Contact (c) Technical	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for running our business, provision of administration services, network security and in the context of a business reorganisation or group restructuring exercise)



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- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

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.

Situations in Which We Will Use Your Personal Information

Dot Medical Limited need all the categories of information in the list above primarily to allow us to perform our contract with you. In some cases, we may use your personal information to pursue legitimate interests of our own, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To process and deliver your order including: (a) Carrying out our obligations arising from any contracts entered into between you and us; (b) To confirm that your orders have been received and to process them; (c) To provide our products and services; (d) To provide you with the information and services that you request from us; (e) For billing purposes, to manage payments, fees and charges (f) To 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 recover payments to employees and debts due to us).



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To ensure security for you and our staff, and help maintain Service quality (calls to our customer services may be monitored and/or recorded for authentication, security, quality, and training purposes).	(a) Identity (b) Contact	(a) Performance of a contract with you
To help in the event of an emergency	(a) Identity (b) Contact	(a) Where we need to comply with a legal obligation.
To comply with applicable laws, regulations, court orders, government, and law enforcement agencies' requests, to operate our systems properly and to protect ourselves, our users, and customers and to solve any customer disputes.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Where we need to comply with a legal obligation.

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

Marketing

We strive to provide you with choices regarding certain personal data uses,

Third-Party Marketing

We do not share your personal data with any company outside Dot Medical Limited or any Third – Party for marketing purposes.

Opting Out

You can ask us to stop sending you messages or using your personal data at any time by filling out or opting-out or requesting our deletion worksheet by written consent, unchecking relevant boxes to adjust your preferences or by following the opt-out by contacting us at any time by written mailed correspondence or email or the relevant means necessary to you.

Where you opt out, this will not apply to personal data provided to us because of a product/service purchase, warranty registration, product/service experience or other transactions.



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Fail To Provide Personal Information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered with you.

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.

5. DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in our group.

We require third parties to respect the security of your data and to treat it in accordance with the law. We will not transfer your personal information outside the EU.

Sharing Personal Information with Third Parties

We will share your personal information with third party's payroll services, where required by law, where it is necessary to administer our contract with you or where we have another legitimate interest in doing so.

Sharing Personal Information with Other Entities in Our Group

We will share your personal information with other entities in our group as part of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data, within Dot Medical Limited.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

6. DATA SECURITY

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

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

7. DATA RETENTION

How Long Will We Use Your Information For

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



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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.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 7 years after they cease being customers for tax purposes and for Quality purposes 10 years.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with applicable laws and regulations.

8. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

MASTER DOCUMENT

Your Rights in Connection With Personal Information

Under certain circumstances, Dot Medical Limited by law has 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.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **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).
- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another company or person, please contact our Dot Medical Limited in writing (see contact details below).

No Fee Usually Required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights).

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.



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9. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Person at Dot Medical Limited in writing (see contact details below). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10. DATA PROTECTION OFFICER

We have appointed a data protection person or point of contact to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact Dot Medical Limited data protection person: Orla Groogan DPO (Data Protection Officer)

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.

11. PRIVACY NOTICE

This version was created on 25th May 2018 and last updated on 30th April 2024

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice 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 notice, please contact info@dot-medical.com

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 to take steps at your request before entering 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.

Document Review

This policy will be reviewed every three years as detailed in QSP-051 Document Control



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Document Review

This policy will be reviewed every three years as detailed in QSP-051 Document Control

	Name	Position	Signature	Date
Prepared by:	Orla Groogan	Quality Co-Ordinator		30 APR 24
Reviewed by:	Ian Rankin	Managing Director		30 APR 24
Approved by:	Shirley A Foster	QA Manager		30 APR 2024

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0	Orla Groogan	New Document	2023-27	30 Apr 2024

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WHEN PRINTED

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