

Privacy Policy

January 2025

Tunstall Healthcare Group ('Tunstall' or 'the Company') is committed to protecting the privacy and security of your personal information. This privacy notice describes how Tunstall uses and protects any information that you give Tunstall when you use this website, in accordance with the UK General Data Protection Regulation ('UK GDPR'). It also refers where applicable to the Data Protection Act 2018 ('DPA18').

Tunstall is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, you can be assured that it will only be used in accordance with this privacy statement.

Under the EU GDPR and UK GDPR, Tunstall is a 'data Controller and Processor'. 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.

Tunstall may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

Scope of this notice

The generic contents of this Notice are applicable to all parts of the Tunstall Group internationally, with the exception of any territory where the scope of EU GDPR and UK GDPR is not relevant.

This Notice applies to all customers and visitors to this website.

What we collect

We may collect the following information:

Name, Job title, Address, Contact information including email address, Demographic information such as postcode, preferences and interests, Other information relevant to customer surveys and/or offers

How your information will be used

We will only use the information that you share with us to understand your needs and provide you with a better service, in particular for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services
- When you visit our website, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences, or your device and is mostly used to make the site work as you expect it to. This data is used by Google, however, the information does not usually directly identify you. You can read Google's Privacy & Terms here for more information.

- We may periodically send promotional emails about new products, special offers, or other information which we think you may find interesting using the email address you have provided, but we will only do so if you have consented to receive such emails.

From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, or mail. We may use the information to customise the website according to your interests.

Your rights

Under the EU General Data Protection Regulation (EU GDPR) and UK General Data Protection Regulation (UK GDPR) you have a number of rights regarding your personal data. You have the right to:

a) be informed of what we do with your data

- Through this Notice (and similar notices) we are explaining in simple language what we will use the data collected from you and about you, for. This is known as a 'Fair Processing Notice'.
- We will use the data we hold on you to understand your needs and provide you with a better service (please see how your information will be used).

b) see what data we hold on you

- You have a right to know what data we hold on you, and confirmation that we are processing it. This will be provided to you on request, within one month, free of charge. If you would like a copy of the information held on you please write to Tunstall Healthcare Group Ltd, Whitley Lodge, Whitley Bridge, Yorkshire, DN14 0HR or email: enquiries@tunstall.com.

c) correct your data if it is inaccurate

- We have an obligation to ensure the data we hold on you is accurate. To this end, we may periodically ask you to confirm certain details, for instance, telephone number, address, etc. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.
- In certain circumstances a self-service portal may be provided for you to access your information and update your information.
- We must complete any rectifications within one month and will not charge you for this.
- In addition, we will inform any third parties with which we have shared your data that a correction is required and will inform you who those third parties are.

d) erase your data in certain circumstances

- Where data is not required for processing, or where you withdraw consent, or object to processing where there is no legitimate reason for us to hold the data, you may ask for that data to be erased.
- You may 'Request to have Personal Data Erased' by writing to Tunstall Healthcare Group Ltd, Whitley Lodge, Whitley Bridge, Yorkshire, DN14 0HR or by emailing: enquiries@tunstall.com.
- This is not an absolute right. Where we are required to retain the data for a lawful reason (typically where there has been a contractual arrangement and information must be retained to comply with taxation laws), then we will reject the request to erase data, and explain our reasons.

- Where we can accept your request for erasure, the data in question will be deleted within one month and we will make no charge for this. Exceptionally, if the request is complex, we may require longer to achieve this and will inform you that this will be the case. This extension period will not exceed two months in total.

e) restrict processing of your data

- You may ask us to restrict further processing of your data but allow it to be retained in our systems. This could enable you to ask us, for example, to suspend the processing of personal information about you if you want to establish its accuracy or the reason for processing it. Where allowed by law, we will comply with this.

f) have your data sent to another party at your request

- You may ask for your data to be sent to another party. We will provide this in a structured machine-readable format (typically CSV, but in another open format should that be more suitable). We will provide this within one month and will not charge for the provision.

g) object to our processing

- You may object to our processing of your data, if your objection is based on one of the following three reasons:
 - That the processing is based on the legitimate interests of the Company and there is something about your particular situation which makes you want to object to processing on this basis.
 - That your data is being used for direct marketing
 - That your data is being used for scientific research and statistical analysis

h) be informed of any automated decision making and profiling we might use

- We do not use your personal data to perform any automated decision making or profiling. (This means making a decision or evaluating certain things about an individual solely by automated means without any human involvement.) Should the Company decide to use any such mechanisms in the future, we will inform you about the nature of the processing, provide a simple method for you to request human intervention or challenge a decision, and we will perform regular checks to ensure the system is working as intended.

Regarding consent

Consent is recorded at the time it is provided, including the method of collection and the specific processing activities it relates to. These records are maintained in accordance with our data retention policy and are available to support legal and regulatory obligations.

If you have provided consent for the processing of some elements of your personal data you have the right (in certain circumstances) to withdraw that consent at any time. This will not affect the lawfulness of the processing before your consent was withdrawn. To withdraw consent for the processing of specific data, you may be able to withdraw consent via the same system with which you originally provided it, or you may write to Tunstall Nordic Data Protection Officer at Nordic.GDPR@tunstall.com.

You have the right to lodge a complaint to the relevant Supervisory Authority, if you believe that we have not complied with the requirements of the EU GDPR and UK GDPR regarding your personal data. In the UK the relevant Supervisory Authority is the Information Commissioner's Office.

If a Data Subject Request results in correction, deletion, or restriction of processing, and the personal data has been shared with a third party, [Company] will notify the relevant third party, where feasible, unless it requires disproportionate effort.

Tunstall Healthcare Group is the controller and processor of data for the purposes of EU GDPR and UK GDPR.

Storage of data

Your personal data will be stored by us in accordance with applicable data protection laws to the extent necessary for the processing purposes set out in this Privacy Notice. Subsequently, we will delete your personal data in accordance with our data retention policy or take steps to properly render the data anonymous. In Europe, the retention periods are generally between 6 and 10 years (e.g. for contracts and notifications). As far as legally permissible or required, we restrict the processing of your data instead of deleting it (e.g. by restricting access to it). This applies in particular to cases where we may still need the data for the execution of the contract or for the assertion of or defense against legal claims, or where such retention is otherwise required or permitted by law. In these cases, the duration of the restriction of processing depends on the respective statutory limitation or retention periods. The data will be deleted after the relevant limitation or retention periods have expired.

Questions

If you have any questions about this Privacy Notice, or concerns as to how your data is processed you can contact:

The Data Protection Officer for Tunstall Healthcare Group, through email: DPO@tunstall.com or in writing at the following address:

The Data Protection Officer, Tunstall Healthcare Group, Whitley Lodge, Whitley, Yorkshire, DN14 0HR, UK

Security

We are committed to ensuring that your information is secure. 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 online.

How we use cookies

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us to provide you with a better, faster, safer user experience, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites, and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

How to control your personal information

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.