

Privacy Statement

Our Privacy Statement

Focus Group is committed to protecting the privacy of your personal information. We have written this Privacy Statement to let you know how Focus Group uses your personal data. In this statement you will find information about the types of personal data we collect from you, when we collect your personal data and how long we keep it for, how we collect your personal data, our reasons for collecting and using your personal data, and information about how we share your personal data. When we say "we", "us", or "our" in this Privacy Statement, we mean Focus Group or its subsidiaries or any of them as the context so requires.

YOUR RIGHTS IN RELATION TO PERSONAL DATA AND HOW TO EXERCISE THEM

Under certain circumstances you have the following rights:

- the right to ask us to provide you, or a third party, with copies of the Personal Data we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;
- the right to request erasure, anonymisation or blocking of your Personal Data that is processed in breach of the law;
- the right to object on legitimate grounds to the processing of your Personal Data. In certain circumstances we may not be able to stop using your Personal Data. If that is the case, we'll let you know and explain why; and
- withdrawal of consent – when Personal Data are processed on the basis of consent an individual may withdraw consent at any time (this may apply to processing of special categories of Personal Data where you have instructed us to act on your behalf and includes the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership). In the event that you no longer want to receive any marketing material from us, please use the unsubscribe option (which is in all of our marketing emails to you), or contact the relevant Data Controller as set out below.

To exercise such rights and if you have any questions about how we collect, store and use Personal Data, then please contact us using the details below.

Please take a moment to review this Privacy Statement in detail to understand our views and practices regarding your personal data and how we will treat it.

Any changes to this Privacy Statement will be communicated on www.think-healthcare.co.uk and, unless stated otherwise, will take effect immediately once posted.

You can contact us using the following contact information:

Office for Data Protection Compliance
Focus Group
Ham Road
Shoreham-by-Sea
West Sussex
BN43 6PA
T: +44 (0) 330 024 2000
E: compliance.officer@focusgroup.co.uk

WHAT PERSONAL DATA DO YOU COLLECT FROM ME AND USE?

We collect, store and use the following categories and types of data which identifies you or which can be used to identify you:

- **Identification data**, such as your name, business or personal email address, business or personal address, business or personal telephone number, business or personal social media handles, IP address and location;
- **information about your job**, such as your position, title, management level, work location, division, department, and position level;
- **record of correspondence** when you contact us (including email and phone conversations);
- **details of transactions** you have made with us and the fulfilment of those transactions; and
- **information about your access to our network and premises**, such as CCTV images, swipe card access, time recording software and internet access usage.

WHEN DO YOU COLLECT MY PERSONAL DATA?

We collect your personal data:

- when you visit any of our websites and agree to the use of cookies, or where you use our contact functionality on the websites;
- when you sign up to receive email alerts, marketing information or other communications from us via our website;
- when you report an issue, ask us a question or email us with feedback, including through any "contact us", helpline or webchat channels;
- when you respond to any surveys that we have sent to you via email; and/or

- when you use our products and services.

In most cases you provide your personal data directly to us via our website. However, we may collect some usage data automatically when you browse our website. [Company names are identified from site traffic by processing IP addresses. This processing is purely for analytical purposes. The information is not used to identify an individual, only company names.]”

WHAT ACTIVITIES DO YOU CARRY OUT USING MY PERSONAL DATA – "PROCESSING ACTIVITIES"?

We use your personal data to carry out the following Processing Activities:

- to carry out our obligations arising from any contract entered into between you and us (e.g. provision of telecommunication services);
- help you to complete a transaction or order;
- provide you with support or education about our products and services;
- provide you with information about our products and services;
- for training purposes, quality assurance or to record details about the products and services you order from us;
- communicate with you;
- Recruitment;
- improve your experience when using our websites; and
- comply with our business, regulatory and legal obligations.

WHY DO YOU CARRY OUT THESE PROCESSING ACTIVITIES USING MY PERSONAL DATA?

Some of the laws that apply to us require us to tell you the legal reason for using your personal data. We list these below:

Consent: Where applicable and appropriate, we will ask for your consent to collect and use your personal data. If we need your consent to collect and use your personal data we will make clear to you that the provision of your consent is voluntary. You have the right to withdraw your consent at any time by contacting us using the contact information set out above.

Our core activities: In many cases using your personal data is core to our legitimate business interests. Where we use your personal data for these purposes you will have the right to object to our use of your personal data by contacting us using the contact information set out above.

We use your personal data for our legitimate interests to provide you with information about our products and services and to understand your use of our website, products, and/or services. We use information collected via cookies (electronic text files) that we place on to your machine in order to provide you with the best level of service when using our tools. These analytics tell us whether you had technical difficulties when using our website or to provide you with a

service that is tailored to you. Our Cookie Notice provides you with more information about our use of cookies.

Legal Requirement: At times we may receive requests from regulators or other authorised bodies to use your personal data to comply with a legal or regulatory obligation. Where this is the case, we will ensure that the request is legitimate.

Overall, the provision of your personal data is voluntary for you and not required by law. However, in order to provide the website to you, to carry out a contractual relationship with you (e.g. provision of telecommunication services) and/or to offer other products and services to you, your personal data are necessary. Not providing your personal data may result in disadvantages for you - for example, we may not be able to carry out a contractual relationship with you or you may not be able to use certain products and services or may accept limited functionality. However, not providing your information will not result in legal consequences for you.

DETAILS OF OUR DATA PROCESSING

The following information provides details on a non-exclusive basis on the types of data we process for each activity and their respective purpose and lawful basis.

We process your personal data to:

Activity	What Data	Whose Data	Why	Lawful Basis
Fulfilment of our Services	Identity data Contact data Financial transaction data & Purchase history Records of communication	Customers Business partners	To carry out our contractual obligations (e.g., provision of telecommunication services). Complete a transaction. Manage our relationship with you. To communicate with you. Provide you with support or education about our products and services. Training purposes, quality assurance or to record details about the products	Necessary to perform our obligations in accordance with any contract that we may have with you.

			and services you order from us.	
Product support, Customer services and enquiries	Identity data Contact data Profile data Financial and transaction data	Customers	To manage and respond to your enquiry. To provide you with education and support about our products.	Necessary to perform our obligations in accordance with any contract that we may have with you. Necessary for our legitimate interest so that we can help you with your enquiry, provide a good standard of service and improve our customer services.
Marketing	Identity data Contact data Marketing and Communications data Profile data	Customers Prospective customers	To send you marketing communications about products and services where we have a lawful basis to do so. To make suggestions and recommendations to you about goods or services that may be of interest to you. Where we are sending you personalised marketing, we may also use Profile Data to help us decide what sort of personalised marketing to send you.	Necessary for our legitimate interest to decide what marketing content we think may appeal to you and ensure our marketing is most effective. If you do not wish to receive any direct marketing communications from us, you can request us to cease using your personal data and providing your personal data to any other third parties for direct marketing purposes at any time. You can do this without charge by contacting us using the details set out under the "Contact us" section above.
Business administration and legal compliance	All data mentioned in "What data do we collect" section	Customers Business partners	To comply with our legal obligations. To enforce our legal rights or defend potential legal claims.	Necessary for our legitimate interests (in order to operate our business in an effective manner).

			<p>To protect the rights of third parties.</p> <p>To facilitate a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.</p>	Necessary to comply with a legal obligation.
Recruitment	<p>Identity data</p> <p>Contact data</p> <p>Recruitment data</p>	<p>Prospective employees</p> <p>Employees</p>	<p>To assess your suitability for any of our positions that you apply for.</p> <p>To communicate with you about the recruitment process.</p> <p>To keep records about our recruitment process.</p> <p>To comply with our legal and regulatory obligations in relation to recruitment.</p> <p>To review our equal opportunity profile in accordance with applicable legislation.</p>	<p>Performance (or entering into) of a contract with you.</p> <p>Necessary for our legitimate interest to ensure that we can make the best recruitment decisions.</p>
Website browsing	<p>Behavioural data</p> <p>Technical and usage data</p>	Website visitors	To help us understand how you are using and navigating our websites.	Necessary for our legitimate interest to enable us to provide our websites in secure and effective way and make improvements to the websites.

FOR HOW LONG DO YOU KEEP MY PERSONAL DATA?

We keep your personal data for no longer than is necessary for the purpose for which the information is collected and to manage our relationship with you. Where personal data is kept, that period will be determined based on applicable local law. For further information, please contact us as set out above.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) or receive anonymised personal data for research or statistical purposes, in which case we may use this information indefinitely without giving further notice to you.

DO YOU SECURELY STORE MY PERSONAL DATA?

We apply strict security standards, controls, and processes to protect your personal data from unauthorised access, loss, or accidental deletion. These include restricting who can have access to your personal data and protecting your data with security tools appropriate to the type of information e.g., encryption software.

We also require that our third-party processors who handle your personal data do the same.

DO YOU USE COOKIES?

Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that Cookie. Cookies are useful because they allow a website to recognise a user's device. Cookies allow you to navigate between pages efficiently, remembering your preferences and generally improving the user experience.

Our [Cookies Notice](#) provides you with more information about our use of Cookies.

DO YOU SHARE MY PERSONAL DATA WITH THIRD PARTIES?

To help us carry out our Processing Activities, we may need to share your personal data with entities within and outside of Focus Group as follows:

- **FOCUS GROUP ENTITIES** – we may transfer your data to other Focus Group entities who may collect, transfer and/or use the personal data we have collected from you for some or all of our Processing Activities. Where we share your personal information with other Focus Group entities, they will use your information in a manner consistent with the purposes for which it was originally collected and consistent with this Privacy Statement and applicable data protection and privacy laws.
- **OUR DATA PROCESSORS** – from time to time, we may share your personal data with our third-party service providers or with other Focus Group entities who provide us with legal, regulatory, corporate advisory, talent management, human resources (inc. training, recruitment), marketing, communication and/or IT & product support services ("Data Processors"). To provide such services, our Data Processors process your personal data on our behalf. Our Data Processors have met our criteria as trusted guardians of personal data and are subject to contractual obligations to implement appropriate security measures to safeguard your personal data and to process personal data only as instructed by us.

- **Other Third Parties** – your personal data may also be transferred to Regulators (e.g. Ofcom), Courts, and other authorities (e.g. tax and law enforcement authorities) and independent external advisors (e.g. lawyers, auditors). We may also share certain personal data with business partners, customers, and suppliers to carry out our business activities.

For the full list of the Focus Group entities, Data Processors and other third parties that we may share your data with, please contact us as set out above. Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy notices and that we have no control over how they may use your personal data. You should check the privacy notices of third-party websites before you submit any personal information to them.

We do not sell or rent the personal information we collect from you.

WHAT SHOULD I DO IF I AM NOT HAPPY WITH HOW MY INFORMATION IS BEING USED?

If you have any concerns about our use of your personal data, you can make a complaint to us at compliance.officer@focusgroup.co.uk.

You also have the right to complain to our relevant Supervisory Authority, which is the Information Commissioner's Officer (ICO) in the UK, who is responsible for ensuring we correctly follow the law or to any other competent data protection Supervisory Authority. You can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113

Contact details of other data protection Supervisory Authorities can be found here: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080