

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.

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 <https://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 that 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;
- 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.

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.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

We explain here the rights that you may have in relation to personal data if you live in the UK or European Union:

HOW CAN I FIND OUT WHAT PERSONAL DATA YOU HOLD ABOUT ME?

You may contact us using the contact information above if you would like more detailed information about what personal data we have collected from you, including the categories of personal data processed, the purposes of the processing and the third parties to whom that data is transferred. You may also request a copy of your data. Note that we do have to consider the interests of others, and certain other legal obligations or restrictions, so this is not an absolute right.

CAN I ASK YOU TO DELETE OR CORRECT MY PERSONAL DATA?

You may contact us using the contact information above if you would like us to delete your personal data or to have your personal data corrected and, if required to do so, we will comply with your request.

CAN I ASK YOU TO STOP USING MY PERSONAL DATA?

You may contact us using the contact information above if you would like us to stop using your personal data (either entirely or for some of our Processing Activities) and, if required to do so, we will comply with your request.

CAN I ASK YOU TO TRANSFER MY PERSONAL DATA TO A THIRD-PARTY?

You may contact us using the contact information above if you would like us to transfer your personal data to a third-party in a structured, commonly used and machine-readable format and, if required to do so, we will comply with your request.

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