

# SEERS Medical Limited – Privacy Policy

## 1. Introduction

SEERS Medical Limited (referred to as “We, “Our” or “Us”), is committed to protecting the privacy and security of your personal information. We take care to protect the privacy of our customers and users of our products that communicate (online or offline) with us, at events, over the phone, or through our websites and social media platforms.

We have developed this privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

Throughout this document we refer to Data Protection Legislation which means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the European Economic Area (EEA). This includes any replacement legislation coming into effect from time to time.

SEERS Medical Limited is the controller for the personal information we process, unless otherwise stated.

We are registered with the Information Commissioner’s Office (the ICO) with registration number **ZA779880**.

You can contact us either by phone, email or post.

### **Our main trading/postal address:**

SEERS Medical Limited  
Kenton Road  
Debenham  
Suffolk  
IP14 6LA  
Phone: +44 (0) 1728 861 590  
Email: [info@seersmedical.com](mailto:info@seersmedical.com)

### **Our Data Protection Lead is:**

Dann Rees  
Sales & Marketing Office Manager  
Email: [dann.rees@seersmedical.com](mailto:dann.rees@seersmedical.com)

## 2. The information we collect and when

We only collect personal information that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of personal information that we will collect on you, and you voluntarily provide to us to support the delivery of our services or on our website or forms. Such information includes:

- Your name
- Address
- Telephone number(s)
- Email address
- Survey responses
- IP address

We may, in further dealings with you, extend this personal information to include your address, purchases, services used, and subscriptions, records of conversations and agreements and payment transactions.

You are under no statutory or contractual requirement or obligation to provide us with your personal information; however we require at least the information above in order for us to deal with you as a prospect or customer in an efficient and effective manner.

The legal basis for processing your data is based on your specific consent, the performance of a contract or our legitimate interest that we will have stated at the point the information was initially provided, therefore we will not store, process or transfer your data unless we have an appropriate lawful reason to do so.

### 3. How we use your information

- To contact you, following your enquiry, reply to any questions, suggestions, issues or complaints you have contacted us about;
- To communicate with you via webchat;
- Make available our products and services to you;
- Process your orders;
- Take payment from you or give you a refund;
- Personalise your shopping experience, for example we may provide you with details of products that match a product, which you may have purchased or enquired about previously;
- For statistical analysis and to get feedback from you about our products, websites, and other services and activities. For example, occasionally we may invite you to review a product or service you've bought or used from us;
- To power our security measures and services so you can safely access our website;
- Help us understand more about you as a customer, the products and services you consume, so we can serve you better;
- Contact you about products and services from us;
- Provide you with online advertising, promotions and marketing material such as newsletters; and
- Help answer your questions and solve any issues you have.

### 4. Who we might share your information with

We may share your personal data with other organisations in the following circumstances:

- If the law or a public authority says we must share the personal data;
- If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud or for debt collection purposes);  
or
- We will not share your information with any third parties for the purposes of direct marketing.
- We use data processors who are third parties who provide elements of services for us. We have Data Processor Agreements in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us or further sub-processors who must comply with our Data Processor Agreement. They will hold your personal data securely and retain it for the period we instruct.

### 5. How we keep you updated on our products and services

We will send you relevant offers and news about our products and services in a number of ways including by email. Marketing lists (containing names and contact details) are often purchased from Data & Marketing Association approved data brokers. It is in the legitimate interest of SEERS Medical Limited to use such marketing lists to promote relevant products to the businesses sectors which are being marketed. We feel that there is no harm to any data subject rights as these are business to business contacts and in the event that a recipient does not want to receive further messages there is an unsubscribe function on the bottom of any correspondence.

You may also consent to receiving our Medical Newsletter via our website. This is an email containing the latest product development and company news. However, should you wish no longer to receive it, you can withdraw your consent and unsubscribe at the bottom of the email at any point in time.

## 6. Your rights over your information

### 6.1 The right to be informed about our collection and use of personal data;

You have the right to be informed about the collection and use of your personal data. We ensure we do this with our internal data protection policies and through our external website policy. These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

### 6.2 Right to Access Your Personal Information

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out below.

### 6.3 Right to Correction Your Personal Information

If any of the personal information we hold about you is inaccurate, incomplete or out of date, you may ask us to correct it.

If you would like to exercise this right, please contact us as set out below.

### 6.4 Right to Stop or Limit Our Processing of Your Data

You have the right to object to us processing your personal information for particular purposes, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

### 6.5 Right to Erasure

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

### 6.6 Right to Portability

The right to portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used and machine readable format. It also gives them you the right to request that a controller transmits this data directly to another controller.

If you would like to exercise this right, please contact us as set out below.

### 6.7 For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

## 7. How long we keep your information for

We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the Data Protection Legislation and never retain your information for longer than is necessary.

## 8. Giving your reviews and sharing your thoughts

When using our website and social media sites, you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

## 9. Security

Data security is of great importance to SEERS Medical Limited and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we have determined are entitled to be there (by use of passes, key card access and other related technologies);
- Implementing access controls to our information technology
- We use appropriate procedures and technical security measures to safeguard your information across all our computer systems, networks, websites and offices;
- Never asking you for your passwords;
- Advising you never to enter your account number or password into an email or after following a link from an email.

## 10. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). We recommend that you check this policy regularly to keep up-to-date.

## 11. How to contact us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

**By email:** [info@seersmedical.com](mailto:info@seersmedical.com)

**By post:** Data Protection Lead, SEERS Medical Limited, Kenton Road, Debenham, Suffolk, IP14 6LA.

Thank you for taking the time to read our Privacy Policy.

This Policy was last updated on 03/09/2020.