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## PRIVACY NOTICE

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### BACKGROUND:

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our employees, customers and suppliers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. Information About Us

De Soutter Medical Limited, a Company registered in England under number 03164365, whose registered office is at Halton Brook Business Park, Aston Clinton, HP225WF;

Email address: info@de-soutter.com

Telephone number: 01296 634000.

Postal Address: Halton Brook Business Park, Aston Clinton, HP225WF

### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

### 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Personal Data Do You Collect?**

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 about you, from third party websites or that you have voluntarily provided to us on this website or from enquiry/contact forms, event/exhibition or other contact methods includes:

- Your name;
- Telephone number(s);
- Email address;
- Your company;
- Job title;
- Survey responses;
- Cookies; and/or
- 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 client in an efficient and effective manner.

The legal basis for processing your data is based on your specific consent/performance of a contract/compliance with a legal obligation or our legitimate interest that we will have requested/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.

## 6. Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

**Session Cookies.** We use Session Cookies to operate our Service.

**Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.

**Security Cookies.** We use Security Cookies for security purposes.

## 7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and services to you.
- Personalising and tailoring our products and services for you.

- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email or post that you have opted-in to (you may unsubscribe or opt-out at any time)

#### 8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

#### 9. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

#### 10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Part 8.

#### 11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**12. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of our Data Protection Officer):

Email address: [gdpr@de-soutter.com](mailto:gdpr@de-soutter.com)

Telephone number: 01296 634050.

Postal Address: Halton Brook Business Park, Aston Clinton, HP22 5WF

**13. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

This Notice was last updated December 2023