



Your partner in aesthetics

## YOUR PRIVACY

Our reputation is based on the highest standards of personal service and working in partnership with you to understand your business and your needs. That's why looking after the information you entrust in us is the cornerstone of trust between us

### Our commitment to your privacy

**No fuss:** You have the right to know how we collect and use your information. For more details, please take a bit of time to read how we do this below

**No frills:** We only collect the information we need to enable us to let you know about the products and services that matter to you.

**No surprises:** If you don't want to hear from us, we respect that. Of course, please let us know and we will take you off our mailing lists.

**No spam:** We will never sell your information to anybody else.

**No worries:** Have a concern? Want to get in touch? No problem use our contact us button at the top of this page and we'll get back to you as soon as we can. Or drop us a line at [gdpr@dental-directory.co.uk](mailto:gdpr@dental-directory.co.uk)

### Finding your way around this document

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There are links to websites and in this document, which may not belong to Medfx. Please don't

forget that if you click on those links the people or entities who run those sites may collect or use your information in some way.

When you leave this website, we encourage you to read the privacy notice of every website you visit.



## THE KIND OF PERSONAL INFORMATION WE HOLD ABOUT

In the table below, we set out the personal information which we collect and use about you. This gives you more details on:

- what we use
- why we use it, and
- the lawful basis for using it

Purpose/ activity	Type of personal information (see the 'Collecting your personal information' section below for details on what these types of data mean).	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> <li>• Contact data,</li> <li>• Identity data, and</li> <li>• Profile data</li> </ul>	Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> <li>• manage payments, fees and charges, and</li> <li>• collect and recover money owed to us</li> </ul>	<ul style="list-style-type: none"> <li>• Contact data,</li> <li>• Identity data</li> <li>• Financial data</li> <li>• Marketing and Communications data, and</li> <li>• Usage data</li> <li>• Transaction data</li> </ul>	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• notifying you about changes to our terms or privacy policy, and</li> <li>• asking you to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Identity data</li> <li>• Marketing and Communications data, and</li> <li>• Profile data</li> </ul>	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and

To enable you to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Identity data</li> <li>• Marketing and Communications data</li> <li>• Profile data, and</li> <li>• Usage data</li> </ul>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to study how customers use our products and services, to develop them and grow our business)</p>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Identity data, and</li> <li>• Technical data</li> </ul>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Identity data</li> <li>• Marketing and Communications data</li> <li>• Profile data</li> <li>• Technical data, and</li> <li>• Usage data</li> </ul>	<p>Necessary for our legitimate interests (to study how customers use our products and services, to develop them, to grow our business and to inform our marketing strategy)</p>
To use data analytics to improve our website, products and services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Technical data, and</li> <li>• Usage data</li> </ul>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
To make suggestions and recommendations to you about goods or services may be of interest to you	<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Identity data</li> <li>• Profile data</li> <li>• Technical data, and</li> <li>• Usage data</li> </ul>	<p>Necessary for our legitimate develop our products/services and our business)</p>

Here is a bit of detail on what we mean by 'personal information' and 'legitimate business interests':

- 'personal information' means any information about you from which you can be identified, and
- 'legitimate interests' means the interest of Medfx in managing our business so, ultimately, we can give you the best possible products and services. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

The company responsible for your information and privacy (also known as the 'data controller') is Med-fx Limited.



## COLLECTING YOUR PERSONAL INFORMATION

We use different methods to collect data from and about you including through:

- direct interactions. You may give us your personal information by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal information you provide when you:
  - apply for our products or services
  - create an account on our website, person or phone
  - subscribe to our service or publications
  - request marketing to be sent to you
  - enter a competition, promotion or survey
  - give us some feedback, or
  - give us your details at an exhibition or event
- automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. [We may also receive technical data about you if you visit other websites employing our cookies.]
- third parties or publicly available sources. We may receive personal information about you from various third parties and public sources as set out below
  - technical data from the following parties:
    - ✕ analytics providers such as Google Analytics and WOW Analytics
    - ✕ advertising networks such as Google, Facebook and LinkedIn
    - ✕ search information providers Google Analytics
  - identity and contact data from data brokers or aggregators, such as Communicator
  - contact, financial and transaction data from providers of technical, payment and delivery services, and
  - identity and contact data from publicly available sources such as Companies House, on-line directories and websites and the Electoral Register

Here is a bit of detail on what we mean by the different types of data:

- 'contact data' includes billing address, delivery address, e-mail address and telephone numbers
- 'financial data' includes bank account and payment card details,
- 'identity data' includes first name, maiden name, last name and username or similar identifier
- 'marketing and communications data' include your preferences in receiving marketing from us and our third parties and your communication preferences
- 'profile data' includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses

- 'technical data' means includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- 'transaction data' includes details about payments to and from you and other details of products and services you have purchased from us, and
- 'usage data' includes information about how you use our website, products and services.

'We may record calls to us for training purposes and to improve the quality of our services to you.'



## IP ADDRESS LOOKUP

We use third parties to provide information about visitors to our websites. When you visit our websites we will record your IP address.

This address will be matched against public and proprietary IP address databases to provide us with information about your visit. This information may identify the organisation to whom the IP address is registered but not individuals. In some limited cases (such as single person companies) it may be possible to identify personal data from publicly available ICANN data.



## COOKIES

Cookies allow us to provide important site functionality, so you don't have to re-enter lots of information. They also allow us to remember what links and pages have been clicked or viewed during a session. If you have provided us with personal data, completing a contact form for example, we may associate this personal data with other information. This will allow us to identify and record what is most relevant to you.

By using your browser controls, you are always in control of the cookies we store and access on your computer. More information on how to control cookies and limit personal data processing can be found at [www.youronlinechoices.com/uk/five-top-tips](http://www.youronlinechoices.com/uk/five-top-tips).

You can view our cookie policy here: <https://dental-directory.co.uk/Privacy>



## USING YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- where we need to perform the contract, we are about to enter into or have entered into with you
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, and
- where we need to comply with a legal or regulatory obligation.

We may use the following data on you:

- contact data
- identity data
- profile data
- technical data, and
- usage data to form a view on what we think you may want or need, or what may be of interest to you. (See the 'Collecting your personal information' section for details on what these types of data mean).

This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if:

- you have requested information from us
- purchased products or services from us, or
- if you provided us with your details when you entered a competition or registered for a promotion or an event

and, in each case above, you have not told us that you don't want to receive that marketing.

If you don't want to receive any marketing from us, that's fine, just let us know. Please bear in mind, however, that where you opt out of receiving marketing messages, this will not apply to personal information provided to us as a result of a product/service purchase, warranty registration and/or product/service experience.



## SEEING ADS FOR MEDFX ONLINE

We like to keep you aware of the great products and services which we offer. This means that if you visit the Medfx site, other sites such as Google will show ads from us on other sites across the Internet (including Google itself). Google helps us do this by using cookies or

You can opt out of this at any time by visiting:

- Google's Ads settings, or
- the Network Advertising Initiative [opt-out page](#).

For more information on how Google collects and uses your personal information, please take a bit of time to read their [privacy policy](#).



## SOCIAL MEDIA

We love social media and chatting with you there, whether it be on Facebook or LinkedIn:

<https://www.facebook.com/Med-fx-1891833521137697/>

<https://www.linkedin.com/company-beta/10600472/>

Don't forget, however, that everybody can see everything you do there (our sites are public) so if you want us to keep your information private, please don't put anything on these sites which you or your loved ones would like to keep private, whether now or in the future.

We will always try to respond to you using another medium such as e-mail or phone, where appropriate.

If you use certain social media features from within our website or connect with us on our social media webpages, the privacy policies of those companies will apply. Please read them carefully before you share your



## FAILING TO GIVE US YOUR PERSONAL INFORMATION

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products and services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.



## CHANGING WHY WE USE YOUR PERSONAL INFORMATION

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



## SHARING YOUR PERSONAL INFORMATION

We may share your personal information with other people or businesses where:

- required by law
- where it is necessary for the purposes of administration:
  - with other entities in our group
  - providers who provide IT and system administration services such as Mail Chimp
  - professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
  - HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances
  - couriers
  - relevant third parties in order to apply any rebates which may be offered to you from time to time

If we do this, we require these third parties to respect the security of your personal information

and to treat it in accordance with the law. In addition, all of our third- party service providers and other entities in our group are required to take appropriate security measures to protect your personal information in line with our policies.

We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information:

- for specified purposes, and
- in accordance with our instructions.

We will, where necessary, share your personal information where we have another legitimate interest in doing so, with other third parties, for example in the context of the possible sale or restructuring of the business.



## TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE OF THE EEA

At Medfx we take full advantage of cloud-based technologies. It means that our teams can work together in a much more dynamic way including when they are out of the office visiting our customers. Ultimately, using the cloud supports our goal of helping your business' growth plans, through superior product knowledge, competitive pricing and the capability to supply everything your practice requires.

When we use the cloud, your personal information is sent to, and stored on, computers which aren't physically located at Medfx. The majority of our cloud- based services are based in the European Economic Area (EEA) so your personal information stays in the EEA. (The EEA includes all of the countries of the European Union (EU), including the UK, together with Iceland, Liechtenstein and Norway).

However, like many businesses, some of the cloud-based services we use are not based in the EEA, like Google Cloud (see below). This means that your personal information leaves the EEA. When this happens, we

have made sure that we use a cloud-based service that collects and uses your personal information in accordance with high data protection standards.



## GOOGLE DOCS

Medfx uses Google Cloud, and G Suite in particular, to create and work on documents whether at Medfx or externally.

Whenever we use Google Cloud, we ensure that a similar degree of legal protection is given to your personal information as would apply in the EEA by applying, in particular, the following safeguards:

- Google transfers personal data using approved EU Model Contract Clauses (for more information go to: [EU Data Protection Compliance: Google Cloud International Data Transfer Mechanisms](#)), and

- Google has certified to the EU-U.S. Privacy Shield since 22 September 2016 and to the Swiss-U.S. Privacy Shield since 18 April 2017 (for more information go to: [EU Data Protection Compliance: Google Cloud International Data Transfer Mechanisms](#))

In addition, when a member of the Medfx team uses Google Cloud they must follow the all of Medfx's data protection policies and procedures.



## SECURING AND PROTECTING YOUR PERSONAL INFORMATION

Your personal information deserves the greatest protection and security. This is why we continue to improve our security measures to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, our policies are that access to your personal information is limited to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality to us. Details of these measures may be obtained from our Data Protection Team.

We have put in place appropriate procedures to deal with any suspected security breach which involves personal information and we will let you and any applicable regulator know of a suspected breach where we are legally required to do so.



## KEEPING YOUR PERSONAL INFORMATION FOR AS LONG AS NECESSARY

Our objective is to only keep your personal information for as long as necessary to fulfil the purposes we collected it.

We may also need to keep it for other purposes including for satisfying any legal, accounting, or reporting requirements.

To work out the appropriate retention period for personal information, we consider:

- the amount, nature, and sensitivity of the personal information
- the potential risk of harm from unauthorised use or disclosure of your personal information
- the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal information are available in our retention policy which you can request from us. Please drop us a line at [gdp@denal-diretory.co.uk](mailto:gdp@denal-diretory.co.uk) or contact the Data Protection Team.

For example, by law we have to keep basic information about our customers (including contact, financial, identity, and transaction data—see 'Collecting your personal information' section for details on what these types of data mean) for an appropriate number of years for tax purposes.

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



## KEEPING YOUR PERSONAL INFORMATION UP TO DATE

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes by e-mailing [gdpr@dental-directory.co.uk](mailto:gdpr@dental-directory.co.uk)



## YOUR DATA MATTERS: HOW CAN I LEARN MORE ABOUT PROTECTING MY INFORMATION?

If you want detailed information on your rights, protecting your information, and what the Information Commissioner's Office (ICO) does and how it can

help you protect your information, please visit <https://ico.org.uk/yourdatamatters>. The ICO is the UK's independent body which upholds information rights.



## EXERCISING YOUR LEGAL RIGHTS

Under certain circumstances, by law you have the right to:

- ask for access to your personal information (commonly known as a 'subject access request'). This means you can receive a copy of the personal information we hold about you and check that we are processing it properly
- ask for the correction of the personal information that we hold about you. This means you can correct any incomplete or inaccurate information we hold about you
- ask for the erasure of your personal information. This means you can ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with the law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- object to the collection and use of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to the collection and use of your personal information on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are collecting and using your personal information for direct marketing purposes. In some

cases, we may demonstrate that we have compelling legitimate grounds to process your personal information which override your rights and freedoms

- ask for the restriction of processing of your personal information. This enables you to ask us to suspend the collection and use of your personal information in the following scenarios:
  - if you want us to establish the information's accuracy
  - where our use of the information is unlawful, but you do not want us to erase it
  - where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims, or
  - you have objected to our use of your information, but we need to verify whether we have overriding legitimate grounds to use it
- ask for the transfer of your personal information to another party (also known as 'data portability'). We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- withdraw your consent (see the 'Exercising your right to withdraw consent' section)

If you want to do any of these things, please contact us drop us a line at [gdpr@dental-directory.co.uk](mailto:gdpr@dental-directory.co.uk) or contact the Data Protection Team. In almost all circumstances you do not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.



## DEALING WITH COOKIES

Not all cookies are bad! Most websites you visit, such as the Medfx site, use cookies to improve how the website works by letting that website 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie'). For more details, check out our Cookie policy.



## EXERCISING YOUR RIGHT TO WITHDRAW CONSENT

You have the right to withdraw your consent at any time (where we rely on consent as the lawful basis for processing your personal information).

To withdraw your consent, please e-mail [gdpr@dental-directory.co.uk](mailto:gdpr@dental-directory.co.uk) or using the unsubscribe function in any e-mail we sen



## CONTACTING THE DATA PROTECTION TEAM

Our Data Protection Team oversees compliance with this privacy notice.

If you have any questions about this privacy notice or how we collect and use your personal information, please contact the Data Protection Team. Details are as follows:

Data Protection Team  
Med-fx Limited  
3 Perry Way,  
Witham,  
Essex,  
CM8 3SX.

E-mail: [gdpr@dental-directory.co.uk](mailto:gdpr@dental-directory.co.uk)

If we have got something wrong, please let us know and we will do whatever we can to try to fix it. Of course, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.



## CHANGES TO THIS PRIVACY NOTICE

From time to time we may need to update this privacy notice to reflect how we are collecting and using your information. If we do this, we will let you know (such as by e-mail or a notice on the Medfx website) so that you can review any updates.

Details of any changes will also be recorded in our change log below.

<b>Date</b>	<b>Nature of Change</b>
May 2018	New privacy policy adopted.
Feb 2019	Privacy policy updated

We are required under data protection laws to let you have the information contained in this privacy notice. If you have any questions about this privacy notice, please drop the data protection team a line at [gdpr@dental-directory.co.uk](mailto:gdpr@dental-directory.co.uk) or contact the Data Protection Officer



## DATA PROTECTION PRINCIPLES

We are committed to complying with data protection laws.

These laws say that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes that we have

clearly explained to you and not used in any way that is incompatible with those purposes

- relevant to the purposes we have told you about and limited only to those purposes
- accurate and kept up to date
- kept only as long as necessary for the purposes we have told you about, and
- kept securely.