

Privacy Notice

Introduction

Our sites and software solutions are operated by Blum Health Ltd. We are a UK-based company with the registration number 12337390 and our registered office is Waterloo Buildings, 21 - 23 Bridge Street, Birkenhead, England, CH41 1AS

As part of the services we offer, we are required to process personal data about our staff, our service users and, in some instances, the friends or relatives of our service users and staff. "Processing" can mean collecting, recording, organising, storing, sharing, or destroying data.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Privacy Officer via hello@blumhealth.co.uk or our registered address above.

We are committed to being transparent about why we need your personal data and what we do with it. This information is set out in this privacy notice. It also explains your rights when it comes to your data.

Service Users

What data do we have?

So that we can provide a safe and professional service, we may need to keep certain records about you. We may process the following types of data:

- **Identity data** includes first name, last name, username, title, and gender
- Contact Data includes billing address, delivery address, email address and telephone numbers

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- Financial Data includes bank account and payment card details
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us
- **Technical Data** 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
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses
- Usage Data includes information about how you use our website, products, and services
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences

We do not collect any special categories of Personal Data (this includes this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) nor do we collect any information about criminal convictions and offences.

Why do we have this data?

We need this data so that we can provide high-quality care and support. By law, we need to have a lawful basis for processing your personal data.

We process your data to:

- Comply with any applicable laws
- Provide our goods and services to clients
- Manage our relationship with clients



• Gain feedback

We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent at any time.

Complying with applicable laws

We use your personal information for the following purposes:

- to comply with our legal obligations.
- to enforce our legal rights.
- protect rights of third parties; and

Who do we share your personal information with for these purposes?

We may share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

What is our legal basis?

Where we use your personal information in connection enforcing our legal rights, or to protect the rights of third parties it is in our legitimate interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us such as a court order.

Providing our Goods and Services to clients

We collect and maintain personal information that you voluntarily submit to us by email, or during your use of the Sites, Applications, our products and/or our Services. We use the personal data you provide to us so that we can fulfil the supply of Services you have engaged us to provide.



Sometimes, we may be granted access to certain user data (including personal data) when we help our clients build, maintain, and develop their own products, applications, or software.

Who do we share your personal information with for this purpose?

We might share your personal information with the following categories of third parties:

 Storage - third party cloud storage providers that store our data on secure servers.

We do not share user data (or other personal data) that we might inadvertently process as part of helping our clients build, maintain, and develop their own products, applications, or software.

What is our legal basis?

It is necessary for us to use your personal information in this way to perform our obligations in accordance with any contract that we may have with you, or to which the data subject is otherwise a party.

Managing our relationship with clients

Our Sites feature a **Contact Us** email link which invites you to submit general enquiries. We collect the personal data you submit to us when making your enquiry.

Where you are a prospective client, we may use personal information that you voluntarily submit to us to prepare proposals for your purchase of our Services, to contact you, or otherwise to manage or administer our relationship with you.

Who do we share your personal information with for this purpose?

We do not actively share your personal information with any third parties, but we do store your data using secure servers based in the cloud.

What is our legal basis?



It is in our legitimate interest to use your personal information to ensure we optimise our service provision for you.

Gaining feedback

From time to time we may contact you to invite you to provide feedback about our Sites, Products and/or Services. Alternatively, you may submit queries or feedback to us via the **Contact us** email link on our Site. We use this information to help us improve the quality of service provided by us. We also use your feedback to monitor the quality of our services and to assist with the selection of future interactive features and service lines.

Who do we share your personal information with for these purposes?

We do not share this data routinely but may use a third-party service provider to assist us with customer surveys and feedback requests.

What is our legal basis?

It is in our legitimate business interests to use the information you provide to us in your feedback for the purposes described above.

Where do we process your data?

So that we can provide you with high quality care and support we need specific data. This is collected from or shared with:

- 1. You or your legal representative(s).
- 2. Third parties.

We do this, via phone, via email, via our website, via application forms, or via our applications

Third parties are organisations we might lawfully share your data with.

These include:

- Other parts of the health and care system such as local hospitals, the GP, the pharmacy, social workers, clinical commissioning groups, and other health and care professionals.
- The Local Authority.

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- Your family or friends with your permission.
- Organisations we have a legal obligation to share information with i.e., for safeguarding, the CQC.
- The police or other law enforcement agencies if we must by law or court order.

Our website

To provide you with the best experience while using our website, we process some data about you.

Our Sites use certain cookies, analytics, beacons, and other technologies of which you should be aware. Please see our <u>Cookie Policy</u> to find out more about the cookies we use and how to manage and delete cookies.

Your rights

The data that we keep about you is your data and we ensure that we keep it confidential and that it is used appropriately. You have the following rights when it comes to your data:

- 1. You have the right to request a copy of all the data we keep about you. Generally, we will not charge for this service.
- 2. You have the right to ask us to correct any data we have which you believe to be inaccurate or incomplete. You can also request that we restrict all processing of your data while we consider your rectification request.
- 3. You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We retain our data in line with the Information Governance Alliance's guidelines (https://digital.nhs.uk/data-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016)

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- 4. You may also request that we restrict processing if we no longer require your personal data for the purpose we originally collected it for, but you do not wish for it to be erased.
- 5. You can ask for your data to be erased if we have asked for your consent to process your data. You can withdraw consent at any time please contact us to do so.
- 6. If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we investigate your objection.

You may need to provide adequate information for our staff to be able to identify you, for example, a passport or driver's licence. This is to make sure that data is not shared with the wrong person inappropriately. We will always respond to your request as soon as possible and at the latest within one month.

If you would like to complain about how we have dealt with your request, please contact:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
https://ico.org.uk/global/contact-us/