# **Privacy and Cookies Policy**

North & South Essex Local Medical Committees Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our Website Terms of Use <a href="www.essexlmc.org.uk/terms-of-use">www.essexlmc.org.uk/terms-of-use</a> and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, whether via this website or otherwise, will be processed by us in accordance with the Data protection Act 1998 and the General Data Protection Regulation (GDPR).

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.essexlmc.co.uk (**our site**), or providing personal data to us through other means, you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 and GDPR, the data controller is North & South Essex Local Medical Committees Limited whose registered office is at Unit 5, Whitelands, Terling Road, Hatfield Peverel, CM3 2AG.

We will comply with data protection law. This says that the personal information we collect and hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept securely.

#### Information we collect from you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect and process the following data about you:

• Information you give us. This is information about you that you give us by filling in forms on our site, by booking to attend events that we run, by working with us to

supply us services or products, or by corresponding with us by mail, phone, e-mail or otherwise. Such information may include name, title, addresses, date of birth, gender, telephone numbers, financial and debit/credit card information and personal and work related email addresses.

**Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), pages you viewed or information searched for page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.
- Information we receive from other sources. This is information we receive about you from third parties or publicly available sources; if you use any of the other websites we operate or the other services we provide. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, sponsors, analytics providers, search information providers and credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

#### INFORMATION ABOUT OUR USE OF COOKIES

Our website may use cookies to distinguish you from other users of our website. Where we do use cookies this is to help us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies, in the event that we are using them.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We may use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps

us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies.

Except for essential cookies, all cookies will expire after a fixed period of time.

#### Uses made of the 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:

- 1. Where we need to perform the contract we have entered into with you, or the organisation that you represent.
- 2. Where we need to comply with a legal obligation.
- 3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

- 1. Where we need to protect your interests (or someone else's interests).
- 2. Where it is needed in the public interest or for official purposes.

We use information held about you in the following ways:

- Information you give to us. We will use this information:
  - to carry out our obligations arising from any contracts entered into between you (or the organisation that you represent) and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other services that we offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing

customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form, or other document, on which we collect your data;

- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
  - To provide our services to you, or the organisation that you are associated with;
  - to provide information relating to our services and, or about forthcoming events that we are organising;
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- Information we receive from other sources. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### Disclosure of your information

We may share your personal information with sponsors of events that we run and suppliers and sub-contractors for the performance of any contract we enter into with you, or the organisation that you represent.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will
  disclose your personal data to the prospective seller or buyer of such business or
  assets.
- If North & South Essex Local Medical Committees Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use or Terms and Conditions of Service and other agreements; or to protect the rights, property, or safety of North & South Essex Local Medical Committees Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Third-party service providers

"Third parties" includes third-party service providers (including contractors and designated agents). The following activities are carried out by third-party service providers: website payments, data storage, website maintenance and management and IT services.

All our third-party service providers 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 data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

# Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by service providers operating outside the EEA who work for us. This includes staff and Third Parties engaged in, among other things, the fulfilment of our service, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any contractual, legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### Rights of access, correction, erasure, and restriction

## Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## Your rights in connection with personal information

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

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This
  enables you to have any incomplete or inaccurate information we hold about you
  corrected.
- Request erasure of your personal information. This enables you to 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 exercised your right to object to processing (see below).
- Object to processing 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 processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us via email at info@essexlmc.org.uk.

# No fee usually required

You will 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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

## What we may need from you

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

#### Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us via info@essexImc.org.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

# Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to us via email at info@essexImc.org.uk.