



Reflexion Care Group Limited Customer Privacy Notice ("Notice")

Reflexion Care Group Limited ("the company", "we", "our", "us") who's registered office is Black Birches, Hadnall, Shrewsbury, Shropshire, SY4 3DH is the Data Controller for the purposes of the General Data Protection Regulation 2018, and any other applicable data protection legislation applicable to our operations within the United Kingdom, for the Company, any Holding Company, any trading style, and/or any subsidiary.

We have developed this Notice so that our customers and their employees (collectively "you", "your") understand how we collect, use, disclose and store your personal information.

Please take time to read and familiarise yourself with this Notice. Through the act of procuring or engaging in the supply of services from us, whether under a formal contract or not, you acknowledge acceptance of this Notice, and any terms implied, as to how we collect, process, disclose and store personal information about you in accordance with this Notice.

Data protection principles

Under the GDPR, there are six data protection principles that the Company must comply with. These provide that the personal information we hold about you must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to those purposes.
- Accurate and, where necessary, kept up to date.
- Kept in a form which permits your identification for no longer than is necessary for those purposes.
- Processed in a way that ensures appropriate security of the data.

The Company is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

What personal information do we collect?

The type of personal information that we will collect will include your name, contact number, e-mail address, business address, other contact information, historic details about our supply of services to you and any non-verbal communication or correspondence between you and us.

We will collect information about you when you contact us, from documents that you may supply to us, and any correspondence or communications that take between you and us.

How will we use the personal information that we collect about you?

We use your personal information to:

- Manage and facilitate the provision of services by us to you;
- To submit to you any documents required to enable us to claim any legitimate fees due in respect of the services that we have provided to you;
- Respond to any enquiry or feedback we receive from you;
- From time to time we may use your personal information for internal training purposes;
- Compliance with any legal requirements placed upon us;
- To contact you to discuss the services that we are / have provided



The Legal Basis upon which we process the personal information will either be to meet contractual obligations (should a formal contract exist between you and us) or for a legitimate interest. We will only use the personal information that we collect about you where it is fair to do so.

For certain types of processing of your personal information we may have to ask you for explicit consent. In such circumstances the Legal Basis that we will rely upon for processing the personal information will be consent.

How long will we retain your personal information for?

We will only keep your information for the length of time we require it for the purposes we have set out in this Policy. Except for in exceptional circumstances, we would not normally retain the information we collect about you for more than seven years after it was last used for the purposes set out in this Notice.

Will we share your personal information with anyone else?

We may share your personal information with any member of our group of companies.

We may disclose your personal information to third parties:

- If we have appointed a third party to perform certain functions on our behalf, where those third parties need to have access to your personal information to properly perform their function:
- If we become involved in a merger, acquisition or transaction involving the sale of some or all of our group company's assets, user information (including the personal information collected from you) may be included in the assets which are transferred to the new owner; or
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

We will never share any of your personal information with anybody outside of our group of companies for mailing or marketing purposes unless we have your consent to do so.

How do we store your personal information?

We have put in place measures to ensure the security of your personal information that we collect and store about you, and will use all reasonable endeavours to protect your personal information for unauthorised disclosure and/or access. Unfortunately the transmission of information via the internet, or via any postal service, is not completely secure and therefore we cannot guarantee the security of any personal information that you transmit to us over this media or which you post to us. As a consequence, any delivery of personal information using either of these forms of communication is at your own risk

Accessing your personal information

You have the right to know whether we hold personal information about you, and, if we do, to request a copy of it. If you would like a copy of some or all of your personal information that we retain, please contact us by writing to the Data Controller care of the address stated in this Notice

Accuracy of personal information

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove any personal information you think is inaccurate

If you have any concerns about how we process your personal information please contact us by writing to the Data Controller care of the address stated in this Policy. If we are unable to satisfactorily deal with your concerns then you are entitled to lodge a complaint with the Information Commissioners Office.



Changes to this Notice

We keep this Notice under review and we will place updates on this web page.

This Notice was last updated May 2018