

Privacy and Cookie Policy

This Privacy Policy sets out how we, Health Pathways Limited process your personal data. We take the privacy of your personal data very seriously and all data captured will be used and held in accordance with the requirements of the Data Protection Act 2018.

Health Pathways Ltd provide services to health care professionals, designing digital solutions for clinical pathways.

The Health Pathways is the controller. If you have any requests concerning your personal data or any queries with regard to how we handle your data you can contact us by phone on 0330 111 0693 or via email team@healthpathways.co.uk or write to us at Health Pathways Ltd, 138 Waterhouse Square, London EC1N 2SW.

We will only process your personal data in accordance with the services we provide to you based on the contract we have, or based on your consent in relation to any marketing activities we undertake. We will collect this consent when you first provide your personal data and you can withdraw that consent at any time by contacting us using the contact information provided above.

Purpose of processing your personal data

Activity	Why we need to process your personal information	Lawful basis to process personal information
Completing an order form on the website	Dealing with a request for information, booking for a demonstration or an order Internal accounting processes Provide you with information relating to the order	Contract Contract Contract
Registering for an event	Dealing with an order / booking Internal accounting processes Provide you with information relating to the	Contract Contract Contract

	order	
Email marketing	To send information and marketing messages by email	Consent
Postal Marketing	To send occasional marketing communications by post	Legitimate interest
Segmentation, analytics, marketing profiling	To provide targeted and appropriate marketing messages	Legitimate interest

The legal basis on which we rely are:

Consent

For email marketing and for passing data to third parties we will use consent, this will usually be in the form of an opt-in tick box, or when you submit an email address expressly for the reason of sending marketing. We will always make it clear what your data will be used for and provide a link to our privacy policy. You can change your mind at any time.

Contract

Processing of your personal data is necessary for us to administer the pre-contract and contractual relationship between ourselves and our supplier in connection with the performance of a contract.

Legitimate interests

We will use legitimate interests to send occasional marketing by post and for segmentation and profiling in order to send relevant targeted communications. Our legitimate interests are to communicate with our members to keep them informed, to grow our business and promote best practice in the marketing industry.

1. Marketing

We conduct basic profiling for our marketing purposes to ensure relevant and targeted communications. This might be in the form of segmentation based on location or stated interests.

We would like to use your personal data to send you details of products or services that we offer that we have identified as likely to be of interest to you. We will only send you

information in line with the preferences you indicated when you provided the personal data.

If at any point you would like to opt-out of receiving communications from us or would like to change the channels (such as email or post) that we use to contact you, please contact us on 0330 111 0693 or via email team@healthpathways.co.uk or write to us at Health Pathways Ltd, 138 Waterhouse Square, London EC1N 2SW.

Third party marketing

Third party data sharing for marketing

Email

From time to time we would like to be able to pass your email address to third parties. We will only do this if you have opted in to third party marketing when you provided your personal data at which point the sponsor will be named.

Post

From time to time we would like to be able to pass your postal address to sponsors. We will only do this if you have opted in to third party marketing when you provided your personal data at which point the third party will be named.

2. Recipients/categories of recipients

In carrying out our business including our obligations to you, we may use sub-contractors. These will be businesses such as mailing houses, email broadcasters, marketing agencies. We will ensure that they respect your privacy and abide by all data protection laws.

3. Retention periods

We will keep your personal data in connection with the services for which it was collected for an appropriate period of time and in accordance with our data retention policy. A copy of this policy can be obtained by emailing team@healthpathways.co.uk.

In terms of personal data we use for marketing, we will keep this data for as long as we are able to market to you and if you withdraw your consent or opt-out of marketing communications, we will keep your contact details only to ensure that we do not contact you again for marketing purposes.

4. Data subject's rights

You have rights in respect of your personal data. We will need to confirm your identity before we can consider your request so, if you wish to exercise any of these rights, we will first need to confirm your identity before we can consider your request so please supply two forms of ID, one of which should be a passport or birth certificate, the other could be a driving licence or utility bill.

The right to be informed – you have the right to be told about the collection and use of the personal data you provide. This privacy policy sets out the purpose for which we process your personal data, how long we will keep your data, who we will share your data with. If you have any questions on how and why we process your data please

contact the DPO. If you want to know more about this right, the ICO has more guidance on their website, which you can access by clicking here.

Right of access – you have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website, which you can access by clicking here.

Right to rectification – you have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website, which you can access by clicking here.

Right to erasure – this right, often referred to as the right to be forgotten allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website, which you can access by clicking here.

Right to restrict processing – you have the right to ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DP at the contact details above. If you want to know more about this right, the ICO has more guidance on their website, which you can access by clicking here.

Right to object – you have the right to object to our processing of your personal data based on (i) legitimate interests, or for the performance of a task in the public interests/exercise of official authority (including profiling); (ii) direct marketing (including profiling); and (iii) for purposes of scientific/historical research and statistics.

- i. Legitimate interests/legal task – your objection should be based on your particular situation. We can continue to process the data if we can demonstrate compelling legitimate grounds which override your interests.
- ii. Direct marketing – you have an absolute right to ask us to stop processing for the purposes of direct marketing. We will action your request as soon as possible.
- iii. Scientific/historical research and statistics - your objection should be based on your particular situation. If we are conducting research where the processing is necessary for the performance of a public task, we can refuse to comply with your objection. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website, which you can access by clicking here.

5. Processing based on consent

Where we process your personal data based on your consent you have the right to withdraw that consent at any time without reason. You can opt-out by using the unsubscribe/opt-out in any marketing we send you and you can contact us using the contact details above.

6. The right to lodge a complaint to the supervisory authority

If you are unhappy with any aspect of our handling of your data you can make a complaint to the Information Commissioner's Office, by clicking [here](#).

7. Cookies

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies on <http://www.allaboutcookies.org/>

We use cookies to identify you when you visit this website and to keep track of your browsing patterns and build up a demographic profile.

Our use of cookies also allows registered users to be presented with a personalised version of the site, carry out transactions and have access to information about their account.

Most browsers will allow you to turn off cookies. If you want to know how to do this please look at the menu on your browser, or look at the instruction on <http://www.allaboutcookies.org/> Please note however that turning off cookies will restrict your use of our website.

Cookies we use

Cookie	What it does	How to disable and consequences
_ga _gat	Google Analytics - Tracks web traffic to the site. Page views & clicks.	Disable in browser settings. No user impact
wow.	Communigator - The cookie tracks company IP's, website history and additional contact info which is provided from a variety of data sources.	Disable in browser settings. No user impact
cookie policy	Cookie used to check if user has accepted cookie policy	Disable in browser settings. Site will continue to ask user to accept cookie policy.

newsletter-subscription-shown	Used to check if user has been shown if a newsletter subscription option has been requested current session.	Disable in browser settings. User will be shown subscription option on each new page, rather than just once whilst on site.
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8. Third party websites

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

9. Changes to the privacy policy

This privacy policy is regularly reviewed and will be updated when necessary. If we make any significant changes to the policy we will communicate these to you.