

This privacy statement sets out

- what information THE TPS HEALTHCARE GROUP LTD collects from you and why;
- how THE TPS HEALTHCARE GROUP LTD uses and protects any information that you give; and
- how you can access and manage your information.

THE TPS HEALTHCARE GROUP LTD is committed to ensuring that your privacy is protected. If we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement.

THE TPS HEALTHCARE GROUP LTD may change this statement from time to time by updating this page. We will make clear whenever any changes are made. This statement is effective from May 2018.

### **What we collect**

We may collect the following information:

- name;
- job title;
- contact information including email and home address;
- demographic information such as postcode, eircode, preferences, health related information and interests.

### **What we do with the information we gather**

We require this information to understand your needs and provide you with a better service. In particular, we will use it and process it lawfully for the purposes of:

- monitoring, recording and storing telephone or email communications for the purpose of internal training, to improve the quality of our customer service and in order to meet any legal and regulatory requirements;
- improving our products and services;
- customising our website according to your interests;
- periodically sending you promotional mails, emails or SMS messages about new products, special offers or other information which we think you may find interesting using the contact details which you have provided;
- use your information to contact you for market research purposes; and
- contact you by phone in relation to the above.

We will also use your information to manage our contractual relationship with you for:

- internal record keeping and account management purposes (e.g. verifying your identity and fulfilling orders you place); and
- contacting you by email, phone or mail for the purpose of account administration and/or processing and fulfilling orders.

If you contact us or we contact you, we may ask for certain information from you to confirm your identity, check our records and deal with your account efficiently and correctly.

Where we have asked for your consent to use your personal information for a particular purpose, this consent can be withdrawn by you at any time. Please see the section entitled 'Controlling your personal information' below.

## **Security**

The security of your information is very important to us. As part of our commitment to keeping your data safe, our technical experts maintain physical, electronic and managerial procedures to keep safe the information we collect online.

Only authorised employees and carefully checked agents, contractors and sub-contractors, who provide a particular data processing service for us, are permitted access to your data. These people will only be allowed access to your data for the purposes identified within this Privacy Policy, processing it on our behalf or for IT security and maintenance.

If a third party processing your data on our behalf is located in a non-EU country that does not have data protection laws equivalent to those in the EU, we will always take appropriate additional steps to ensure that your personal information is kept safe and secure by those processing your data on our behalf. This will generally involve ensuring that such third party agrees to sign up to a formal legal agreement committing such party to comply with standards equivalent to those that would apply where that party to be located within the EU.

We aim to protect all of our customers from fraud. As part of this, we may use your personal information to verify your identity to help prevent or detect fraud. These checks may involve your information being disclosed to credit reference agencies, who may keep a record of that information. This is not a credit check and your credit rating will be unaffected.

Sometimes, you might wish to disclose sensitive information to us, for example if you need a priority delivery because you are receiving medical treatment. We will only use sensitive data for the specific reason you disclosed it to us and we will take extra care to keep it secure. From time to time, we will check with you that we may continue to use that sensitive data for the specified purpose. We will re-check this consent on a periodic basis. In either case, you may withdraw your consent at any time.

## **How long we hold your information for**

The time period for which we keep information varies according to what we use the information for. Unless there is a specific legal requirement for us to keep information, we will keep your information for as long as it is relevant and useful for the purpose for which it was collected.

Where we are using your personal information to send you marketing information we will retain that for 2 years as we understand that you will not buy from us on every occasion but frequently we see repeat purchases from customers in this time period. We will retain your account information for 7 years in line with relevant tax and contract requirements.

You are entitled to request that we erase your personal information at any time, for example where you cease to be an active customer of ours. Whilst we will generally seek to comply with your request, there will be circumstances where we are entitled to retain such personal information (e.g. in respect of legal claims).

### Controlling your personal information

You may choose to restrict or control the collection or use of your personal information in the following circumstances:

- when you are asked to fill in a form on the website or elsewhere (ensure that you do not tick any box which consents to our use of your personal information if you do not want us to use your personal information for those purposes);
- if you have previously agreed to us using your personal information for specific purposes and wish to change your mind;
- If you wish for your personal information to be erased from our systems;
- If you wish for us to transfer your personal information to a third party (e.g. another service provider). In this case, we will provide you with certain personal information held by us for you to pass to that third party (or, in certain circumstances, we may be able to transfer that data to such third party directly if you wish for us to do so).

You have the right to:

- know that information is being processed;
- access information that is being processed;
- rectification of information being processed;
- erasure of information held on you (commonly known as the right to be forgotten);
- restrict processing;
- be notified about what information has been rectified, erased and restricted;
- portability (that is, to request your data be handed over to someone else);
- object to the processing of your information.

It is important to note that this is not an absolute right to review all the information that is held about you, as there are various exceptions to this right. These include:

- (a) where personal data is kept for the purpose of preventing, detecting or investigating offences and related matters; and
- (b) where the data is given by another person in confidence.

If you want to remove a consent or request erasure or transfer of your personal information, you may do so at any time by writing to us at;

**The TPS Healthcare Group Ltd**  
**Subject Access Requests (HR Department)**  
**27-35 Napier Place**  
**Wardpark North**  
**Cumbernauld**  
**G68 0LL**

Or by emailing us at [subjectaccessrequest@vitalheathcare.com](mailto:subjectaccessrequest@vitalheathcare.com)

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. Where we do seek your permission we will name the relevant third party at the time we seek such permission from you and any such permission shall be limited to that third party.

Sometimes we may have to pass information to statutory bodies authorised to obtain data under various legislation, such as the police or tax authority.

If you believe that any information we are holding on you is incorrect or incomplete, please write, email or call us as soon as possible, using the details set out above. We will promptly correct any information found to be incorrect.

To protect your privacy and security, we will take reasonable steps to verify your identity before granting access or making corrections.

This policy replaces all previous versions and is correct as of May, 2018. We reserve the right to change the policy at any time.

## **Cookies**

How we use cookies

Cookies are alphanumeric identifiers which enable our systems to recognise your browser in order that we can provide you with easy use of the various services available on the website.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of the website.

The table below explains the cookies we use and why.

Cookie Name	Cookie ID	Cookie Description	Additional info
Has Javascript	has_js	A cookie that determines whether your browser has JavaScript enabled. Required by the content management system this site has been built with.	This cookie is strictly necessary for the website to operate.
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. This cookie is essential for the website to operate efficiently.	Click here for an overview of privacy at Google

If you wish to learn more about cookies go to [www.aboutcookies.org](http://www.aboutcookies.org).