

## Our Client Data & Privacy Policy

Cellular Pathology Services Limited (CPS) is committed to protecting and respecting your privacy when dealing with your or your service users' personal data as needed to enable us the delivery of our services, applications and most importantly, care to your service users ("Services"). For the purpose of the Data Protection Act 2018, Cellular Pathology Services is a data controller and data processor.

By visiting our websites or using our Services, you agree that we can use your personal information for the purpose described in this privacy policy.

This privacy policy does not cover the links within our websites linking to other websites. Please refer to and read the privacy statements on the other websites you visit.

### Definitions

In this policy, 'we', 'us' and 'our' mean Cellular Pathology Services Limited (CPS). We also refer to 'personal information' and by this we mean information which relates to or is obviously about you, or from which you can be identified. The terms "data controller", "data processor" and "personal data" are defined in the Data Protection Laws. The "Data Protection Laws" means all applicable privacy and data protection laws including the General Data Protection Regulation ((EU) 2016/679) and any applicable national implementing laws, regulations and secondary legislation in England and Wales relating to the processing of Personal Data, as may be amended, replaced or updated from time to time,

### How we collect information

We collect personal information from you and from third parties (anyone acting on your behalf). Where you provide us with information about other people, you must make sure that they have seen a copy of this privacy policy and comfortable with you giving us their information.

We may collect personal information about:

- Visits to our website, social media or face-to-face;
- Enquiries about our products, services, events;
- Information you provide in client satisfaction surveys or in feedback;
- Information you provide concerning employment vacancies at Cellular Pathology Services;
- Information you provide when emailing, faxing or posting in a complaint;
- Information you provide when completing a contact form or a request for newsletter;
- Information you provide when you complete a Request Form requiring CPS to undertake an examination of the sample(s) you send with the Request Form;
- Information you provide when creating an account or purchase any of our services;
- Information relating to usage of service (e.g. metadata and log files);
- Information available on public databases or purchased from third parties

### Personal information we collect

The personal data we collect includes

- Name;
- Address;
- Telephone number;

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- Date of birth;
- Sex;
- Health data which may constitute “special category data” of clinical relevance;
- Other data which may identify you or your service users, directly or indirectly

## Special category data

The “special categories of personal data” are defined in the Data Protection Laws and are more sensitive and require a higher degree of protection. These special categories include information about a person’s health.

Our usage of health information and other personal data relating to your service users is wholly limited for the purpose of providing our clinical Services and standard pathology reports in accordance with the written request form. We may pass these details on to any trusted third party who is delivering Services on our behalf under conditions of strict confidentiality for this purpose. We will not pass such details on to any other third party or use them in any other way.

## What we use your personal data for

We process your personal information for the purposes set out in this policy. By law, we must have a lawful and legitimate reason for processing personal information about you if this is:

- Necessary to provide the services set out in a contract; if we have a contract with you, we will process your personal information in order to fulfil that contract (that is, to provide you with our products and services);
- To conduct our obligations arising from any contracts entered into between you and us including accounting management, accounting, billing and auditing;
- To ensure that content from our website is presented in the most effective manner for you and for your device;
- To provide you with information, products or services that you request from us which we feel may interest you, where you consented to be contacted for such purposes;
- To allow you to participate in interactive features of our service, whenever you choose to do so and,
- To notify you about changes to our products and services;

## Legitimate interest

We process your’ and your users’ personal data for a number of legitimate interests, including managing all aspects of our relationship with you, for marketing, to help us improve our services and products, and in order to exercise our rights or handle complaints. We always aim to minimise the data we collect and to limit its use for which we have been given permission.

Legitimate interest is one of the legal reasons why we may process your personal information. Taking into account your interest, rights and freedoms, legitimate interests which allow us to process your personal information include:

- To provide clinical care to you (patient client and non-patient clients) or service users;
- To manage our relationship with you, our business and third parties who provide products or services for us;
- To keep our records up to date and to provide you with marketing as allowed by law;
- To develop and carry out marketing activities and to show you information that is of interest to you, based on our understanding of your preference;
- For statistical research and analysis so that we can monitor and improve products, services, websites and portals, or develop new ones;

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- To contact you about market research we are carrying out;
- To monitor how well we are meeting our internal clinical and non-clinical Key Performance Indicator's (KPI's);
- As we might be required or permitted for legal compliance or any other lawful purpose;
- To enforce or apply our website terms of use, our policy terms and conditions or other contracts, or to protect our, (or our customers or others people's) rights, property or safety;
- To exercise our rights, to defend ourselves from claims and to keep to laws and regulations that apply to us and the third parties that we work with.

## Who we share data with

We may share your personal data with trusted companies within our operational network, with third parties with which we have partnered to allow you to integrate their services into our own Services, and with trusted third party service providers as necessary for them to perform services on our behalf, such as:

- Processing payments;
- Performing analysis of our Services

Our sharing of personal data is only as necessary for any third party to provide the services as requested or as needed on our behalf. These third parties (and any subcontractors) are subject to strict data processing terms and conditions and are prohibited from using, sharing or retaining your personal data for any purpose other than as they have been specifically contracted for or without your consent.

## Marketing

We will only send you marketing information where you have provided your consent to receive it. We may use your personal information to send you marketing by post, by phone, through social media, by email and by text.

You have the right to ask us to stop processing your personal information for marketing purposes by contacting our office for the attention of Data Protection Officer (Information Governance Lead), Unit 12, Orbital 25 Business Park, Dwight Road, Tolpits Lane, Watford, WD18 9DA, or by email to [IT@cellpathservices.co.uk](mailto:IT@cellpathservices.co.uk).

If you don't want to receive emails from us, you can click on the 'unsubscribe' link that appears in our emails or by replying back with the word 'unsubscribe' in the email body. If you don't want to receive texts from us you can tell us by contacting us at any time. Otherwise, you can always contact us on the details above.

## Access to your personal information

You have the right to access your information and to ask us to correct any mistakes and delete and restrict the use of your information. You have the following rights (certain exceptions will apply):

- **Right of access:** the right to make a written request for details of your personal information and a copy of that information.
- **Right to rectification:** the right to have inaccurate information about you corrected or removed
- **Right to erasure ('right to be forgotten'):** the right to have certain personal information about you erased
- **Right to restriction of processing:** the right to request that your personal information is only used for restricted purposes
- **Right to object:** the right to object to processing of your personal information in cases where our processing is based on the performance of a task carried out in the public interest or we have to let you

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know the processing is necessary for our or a third party's legitimate interests. You can object to our use of your information for profiling purposes where it is in relation to direct marketing;

- **Right to data portability:** the right to ask for the personal information you have made available to us to be transferred to you or a third party in machine readable formats
- **Right to withdraw consent:** the right to withdraw any consent you have previously given us to handle your personal information. If you withdraw your consent, this will not affect the lawfulness of CPS's use of your personal information prior to the withdrawal of your consent and we will let you know if we will no longer be able to provide you your chosen product or service
- **Right in relation to automated decisions:** you have the right not to be subject to a decision based solely on automated processing which produces legal effects concerning you, or similarly significantly affects you, unless it is necessary for entering into a contract with you, it is authorised by law or governance or you have given your explicit consent. We will let you know when such decisions are made, the lawful grounds we rely on and the rights you have.

Where we hold or process any personal data relating to your service users, we will provide you with all necessary assistance, at your cost, if any of your service users make a "subject access request" or wish to exercise any other rights in relation to their personal data.

You can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018. In most cases CPS will respond to a subject access request promptly and in any event within 30 calendar days of receiving it.

We will charge £10 for each information request and will ask you to prove your identity with two pieces of approved photographic identification. In certain circumstances, this fee may be waived or increased depending on the time implication of the request. Once the fee has been received and if we do hold information about you we will:

- Give you a description of it;
- Tell you why we are holding it;
- Tell you who it could be disclosed to; and
- Let you have a copy of the information on an intelligible form.

Please note that other than your right to object to the use of your data for direct marketing (and profiling to the extent used for the purpose of direct marketing), your rights are not absolute: they do not always apply in all cases and we will let you know in our correspondence with you how we will be able to comply with your request.

## Cookies

### What is a cookie?

Cookies are small data files containing unique identifiers, which are sent to your device when you visit a website. There different types of cookies which are used to do different things. The cookies used by CPS help us to track basic visitor information and to learn about the behaviour of visitors to our website and how they respond to our marketing communications and for research and statistical purposes. The more we learn, the better we are able to provide relevant and interesting content and services.

The cookies that CPS uses do not collect personal information such as name, address, email address and do not link any information they collect to an individual.

Cookies are used to improve your online experience to;

- Make our website operate as you'd expect

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- Remember your settings during and between visits
- Improve the speed and security of the site
- Allow you to share pages with social networks like Twitter and Facebook
- Continuously improve our website for you
- Make our marketing more efficient and tailored

## Types of Cookies

### Category 1 Cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you require access to, cannot be provided.

User consent is not required for the delivery of those cookies which are strictly necessary to provide services requested by the user.

### Category 2 Cookies

These cookies collect information about how visitors use a website, for e.g. which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Web analytics that use cookies to gather data to enhance the performance of a website fall into this category. For example, they may be used for testing designs and ensuring a consistent look and feel is maintained for the user. This category does not include cookies used for behavioural/ targeted advertising networks.

### Category 3 Cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located.

These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

These cookies are used to remember customer selections that change the way the site behaves or looks. It might also include cookies that are used to deliver a specific function, but where that function includes cookies used for behavioural/targeted advertising networks they must be included in category 4 as well as this category.

CPS collects these types of cookies by functional use. By using [www.cellularpathologyservices.co.uk](http://www.cellularpathologyservices.co.uk), you agree that we can place these types of cookies on your device.

### Category 4 Cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign.

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They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Definitions supplied by the International Chamber of Commerce 'ICC UK Cookie Guide' April 2012.

## Social Website Cookies

So you can easily "Like" or share our content on the likes of Facebook and Twitter we have included sharing buttons on our site.

The privacy implications on this will vary from social network to social network and will be dependent on the privacy settings you have chosen on these networks.

For information on how to delete cookies, please refer to: <http://www.wikihow.com/Clear-Your-Browser's-Cookies>

We do not use cookies to:

- Collect any personally identifiable information without your express permission
- Collect any sensitive information without your express permission
- Pass personally identifiable data to third parties
- Pay sales commissions

## Sharing of data from cookies

As detailed in the privacy policy, CPS may disclose data collected from cookies, such as visitor trends, to third parties, in an anonymous form, for research and statistical purposes, and to help us optimise our website and the targeting of advertisements.

## Security, storage & retention of data

We take appropriate organisational and technical security measures to protect personal information that we hold against unauthorised disclosure or unlawful processing. We store your data securely within the EU and for retention of clinical records we follow the guidance of the Royal College of Pathologists.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## Data protection authority

If you are a resident of the European Economic Area (EEA) and believe we maintain your personal data subject to the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority, the Information Commission Office (ICO).

[www.ico.gov.uk](http://www.ico.gov.uk)

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## Disclosure of personal information

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to disclose them. We may disclose your personal information (to the extent necessary) to third parties in the event that we sell or buy any business or assets.

Where we do so, we ensure that they process information in accordance with our confidentiality and security requirements as well as in accordance with data protection requirements.

## Changes to our privacy policy

We keep our privacy policy under regular reviews. We reserve the right to modify this policy at any time.

## Data protection contact

If you have any questions, comments, complaints or suggestions in relation to this notice, or any other concerns about the way in which we process information about you, please contact our Data Protection Officer (Information Governance Lead) on [IT@cellpathservices.co.uk](mailto:IT@cellpathservices.co.uk)

Or write to the Data Protection Officer (Information Governance Lead);

Cellular Pathology Services  
Unit 12, Orbital 25 Business Park,  
Dwight Road, Tolpits Lane,  
Watford,  
WD18 9DA

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