

Privacy Notice

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INTRODUCTION

Independence Products Ltd respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out within the contents list. Please also use the [Glossary](#) to understand the meaning of some of the terms used in this privacy notice.

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01 IMPORTANT INFORMATION AND WHO WE ARE PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Independence Products Ltd and associated companies collect and process your personal data.

This includes data collected and processed through your use of the Company's website <http://www.ipl.uk.com/> and any sub-sites, including data collected and processed when you order or purchase a product or service through the website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

02 CONTROLLER

Independence Products Ltd is the controller and responsible for your personal data ("we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to [exercise your legal rights](#), please contact our Data Protection Officer using the details set out below.

03 CONTACT DETAILS

Full name of legal entity: Independence Products Ltd, company number 05929050 of Unit 7J Blenheim Court, Blenheim Park Road, Blenheim Industrial Estate, Bulwell, Nottingham NG6 8YP.

Name or title of Data Protection Officer: Shane Hopkins Email address: enquiries@ipl.uk.com

You have a right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Our ICO registration number is Z2514808.

04 CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in January 2024 and historic versions can be obtained by [contacting us](#).

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

05 THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

06 THE DATA WE COLLECT ABOUT 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- 6.1. Identity Data includes first name, last name, date of birth and username or similar identifier, professional qualification, identifier or job role;
- 6.2. Contact Data includes billing address, delivery address, email address and telephone numbers;
- 6.3. Financial Data includes bank account and payment card details;
- 6.4. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us;
- 6.5. Medical Data includes your NHS number, details of any prescriptions that have been issued to you, where applicable your Prescription Exemption Status, health information about a condition or medical ailment which helps us to best advise which products would be suited to your specific needs;
- 6.6. Technical Data includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- 6.7. Profile Data includes your username and password, purchases or order made by you, and any account preferences;

- 6.8. Usage Data includes information about how you use our website, products, and services; and
- 6.9. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Apart from the Medical Data, we do not collect Special Category Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

07 CHILDREN'S PERSONAL DATA

Where we are providing goods and services to children it will be necessary for us to process their personal data. As we have outlined above, we will collect, use, store and transfer different kinds of personal data to provide our goods and services. The personal data we collect in relation to children will include Identity Data, Contact Data and Medical Data.

We have indicated in the Section Purposes for Which We Will Use Your Personal Data how we will use Children's personal data and the legal bases we will rely upon.

References to "you" and "your" personal data in the privacy notice mean personal data of the child where relevant.

08 IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

09 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms, by corresponding with us through our Contact Us area or when you communicate with us by email, telephone or post. This includes personal data you provide when you:

- 9.1. apply for our products or services.
- 9.2. enquire about our samples.
- 9.3. contact us regarding a prescription either for you, or if you are a medical or healthcare professional, for a patient or individual you have referred to us.
- 9.4. subscribe to our newsletters.
- 9.5. request marketing to be sent to you.
- 9.6. report a problem with our website; or
- 9.7. give us some feedback.

Third parties or publicly available sources. We may receive personal data about you from the following parties and sources:

- 9.8. Identity Data, Contact Data, Medical Data, Financial Data, Transaction Data and Profile Data from Independence Direct Ltd (an associated Company who we are a processor on behalf of in order to fulfil prescriptions).
- 9.9. Identity Data, Contact Data and Medical Data from a hospital or medical or healthcare professional if you are referred to us directly by them.
- 9.10. Identity Data, Contact Data, Financial Data, Transaction Data and Medical Data by virtue of transfer of a patient database from Rapidcare.
- 9.11. Identity Data, Contact Data and Medical Data through the NHS Electronic Prescription Service.
- 9.12. Technical Data – analytics providers such as Google Analytics.
- 9.13. Technical Data – cloud-based hosting providers such as WordPress (<https://automattic.com/privacy>).

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using session cookies,

server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

10 HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 10.1. Where we need to perform our existing contract with you, or a contract to be entered into;
- 10.2. 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; or
- 10.3. Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data but there are certain circumstances where we will seek your consent to the processing of your personal data.

We will ask you to give consent before sending any direct marketing communications to you. You may provide consent either in written form or verbally and we will maintain a record of your decision on your customer profile. You have the right to withdraw consent that you have given to us at any time by [contacting us](#). We will not send any direct marketing communications to children.

11 PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer.	a. Identity b. Contact	Performance of a contract with you
To record your health condition relevant to our products (i.e. your stoma or dialysis type).	a. Identity b. Contact c. Medical d. Children's	Performance of a contract with you and in line with the specific conditions allowed by virtue of Schedule 1 of the Data Protection Act 2018, specifically in relation to the processing of personal data for health or social care purposes.
To process and deliver your order including: 1. Order dispatch. 2. Manage payments, fees and charges. 3. Collect and recover money owed to us.	a. Identity b. Contact c. Financial d. Transaction e. Marketing & Communications f. Medical g. Children's	Performance of a contract with you and in line with the specific conditions allowed by virtue of Schedule 1 of the Data Protection Act 2018, specifically in relation to the processing of personal data for health or social care purposes. Necessary for our legitimate interests (to recover debts due to us).
To trace products deliveries for the purposes of product recall.	a. Identity b. Contact c. Financial d. Transaction e. Medical f. Children's	Performance of a contract with you. Necessary for our legitimate interests (industry standards). Necessary to comply with a legal obligation. In relation to Medical Data, in line with the specific conditions allowed by virtue of Schedule 1 of the Data Protection Act 2018. specifically in relation to the processing of personal data for health or social care purposes
To manage our relationship with you which will include:	a. Identity b. Contact c. Profile a. Marketing and Communications	Performance of a contract with you. Necessary to comply with a legal obligation.
a. Notifying you about changes to our terms or privacy policy. b. Asking you to leave a review or take a survey. c. Communication with you regarding product and/or service improvements.		Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services). Consent (prior to sending any marketing materials to you).

To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	a. Identity b. Contact c. Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). Necessary to comply with a legal obligation.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	a. Technical b. Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To monitor criminal activity at our premises.	a. Identity b. (including CCTV footage when amalgamated with other personal data) c. Contact d. Financial e. Profile f. Transaction g. Usage h. Technical	Necessary to comply with a legal obligation
To maintain records as part of the administration of our business.	a. Identity b. Contact c. Financial d. Profile e. Transaction f. Usage g. Medical h. Technical i. Marketing & Communications	Necessary for our legitimate interests, to maintain records of business activity in order to respond to questions, complaints and claims and to protect our business and for accounting purposes. Necessary to comply with a legal obligation, in relation to records kept for tax purposes.

12 NHS NATIONAL DATA OPT-OUT

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment, and we may use some of this information in certain circumstances to help us fulfil your prescription or provide our products to you.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments

- preventing illness and diseases
- monitoring safety
- planning services

This may only take place where there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by UK law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care.

If the patient is a child under the age of 18 a person with parental responsibility may consent to the use of confidential patient information on behalf of the child.

To find out more or to register your choice to opt out, please visit <https://www.nhs.uk/your-nhs-data-matters/> On this web page you will:

- See what is meant by confidential patient information;
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care;
- Find out more about the benefits of sharing data.
- Understand more about who uses the data.
- Find out how your data is protected.
- Be able to access the system to view, set or change your opt-out setting.
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone.
- See the situations where the opt-out will not apply.

You can also find out more about how patient information is used at:

<https://www.hra.nhs.uk/information-about-patients/> (which covers health and care research); and

<https://understandingpatientdata.org.uk/> (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

Our organisation is compliant with the National Data Opt-Out Policy and has systems and processes in place to apply your choice to any confidential patient information we use or share for purposes beyond your individual care.

13 MARKETING COMMUNICATIONS FROM US

You may receive marketing communications from us (or from Independence Direct, an associated company) if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

We will not send marketing communications to children.

15 OPTING OUT OF MARKETING COMMUNICATIONS

You can ask us or third parties to stop sending you marketing messages by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

15 COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

16 CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

17 DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 11 above.

- The NHS™ when we request, process or supply prescriptions.
- Independence Direct Ltd, based in the United Kingdom, in relation to the processing and supply of prescriptions and who may undertake marketing activities in relation to products supplied by us.
- Manufacturers, in the event a product complaint is made. This may include who is making the complaint, and their Identity Data and Contact Data.
- MedOp, based in the United Kingdom, for software used to assist processing prescriptions and supplying orders.
- Google™, based outside the United Kingdom, for data storage.
- Microsoft, based outside the United Kingdom, for data storage.
- Sage™, based in the United Kingdom, for accounting purposes.
- OpenCRM, based outside the United Kingdom in the European Economic Area, for CRM purposes.
- Smith Cooper and their group company Infuse Technology, based in the United Kingdom, for HR/Accounts/IT functions.
- FireText Communications Ltd, based in the United Kingdom, for SMS communication purposes.
- Professional advisors acting as processors including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors, based in the United Kingdom, who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.
Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

18 INTERNATIONAL TRANSFERS

We have partnerships to source products on a worldwide basis, and as a result, the information about you that we process when you buy our products may be used, stored, and/or accessed by individuals operating outside the United Kingdom, including in some circumstances outside the European Economic Area (EEA), who work for us, other members of our group of companies, or third-party data processors. By way of example, our manufacturer partners require data about products where a defect arises, or a complaint is made by an end-user. In most circumstances, such data would be anonymised (e.g. by a hospital or other medical institution).

When providing information about you to entities outside the United Kingdom or the EEA, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy notice as required by applicable law. These measures include:

- Only transferring personal data to countries that have been deemed to provide an adequate level of protection for personal data by the ICO or the European Commission (as applicable); or
- Entering ICO or European Commission approved standard contractual arrangements with them.

You can ask us for more information about the steps we take to protect your personal information when transferring it outside the United Kingdom and the EEA.

19 DATA SECURITY MEASURES

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

20 DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any 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 these purposes through other means, and the applicable legal requirements.

We keep your personal data within our Customer Relationship Management (CRM) system for 12 months from last point of activity or engagement, after which we cleanse these records; we will review this policy intermittently and update this privacy notice if appropriate.

By law we must keep basic information about our customers (including Contact, Identity, Financial, Children's, and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

21 YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

22 NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

23 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

24 TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

25 GLOSSARY LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

26 YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only

applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Independence Products Ltd

VAT Registration Number *GB476662647*