

Privacy Policy

Date last revised: May 2018

Craig Clinic (we/us/our), are committed to respecting your privacy and protecting your personal data. We recognise that your personal data is your property and that you have loaned it to us for specific purposes. Unless otherwise required by law, the Information Commissioner's Office (ICO) guidance or best practice, or in order to perform our contract with you, we will only process your personal data in the way we tell you or in the way you ask us to, and we will give it back to you at any time.

1. This Policy

1.1 This policy explains how we collect, use, share and otherwise process your Personal Data in connection with your relationship with us as a patient, acting for you as a patient, applying for a position with us, or being generally interested in our services and our publications in accordance with applicable data privacy laws and the General Data Protection Regulations (GDPR) which will become applicable as of 25 May 2018 (Data Protection Laws).

1.2 By providing your personal data to us, and/or by visiting www.craigclinic.com you understand, accept and consent to the practices described in this policy.

1.3 Any changes we make to this policy will be posted on this page. You are advised to check back frequently as, unless your consent is required, any changes will be binding on you when you continue to use the Website or work with us after the date of the relevant change.

1.4 For more information relating to your rights under this policy, please see section 9.

1.5 If you have any queries relating to this policy, please contact us at pa@craigclinic.com in the first instance.

2. Who We Are

2.1 For the purposes of the Data Protection Laws, the data controller is Zaclily Limited. We are a limited liability company registered in England (6906723) and our registered office is 20 Coxon Street, Spondon, Derby, DE21 7JG

2.2 Your personal data will be held and stored by us in our internal management information systems. All personal data is stored on Cloud-based servers located in the UK.

3. What Personal Information Do We Collect About You?

3.1 We may collect personal information from you in the course of our consultations, including through your use of our website, when you contact or request information from us, when you engage the services of Dr. Michael Craig.

3.2 The personal information that we process includes:

3.2.1 basic information, such as your name (including name prefix or title), the company you work for, your title or position and your relationship to a person;

3.2.2 contact information, such as your postal address, email address and phone number(s);

3.2.3 financial information, when such as payment-related information;

3.2.4 technical information, such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically;

3.2.5 information you provide to us for the purposes of attending appointments.

3.2.6 identification and background information provided by you or collected as part of our business acceptance processes;

3.2.7 personal information provided to us by or on behalf of our clients, particularly in relation to Medico Legal work, or generated by us in the course or providing services to them, which may include special categories of data; and

3.2.8 any other information relating to you which you may provide to us.

3.3 Where you are a potential employee, worker or other member of our staff, we may collect additional categories

of your personal data from you for the purposes of our recruitment process.

4. How Do We Collect Your Personal Data?

4.1 The categories of data listed in section 3 are collected in the following ways:

4.1.1 we collect information from you as part of our business acceptance processes and about you and others as necessary in the course of providing legal services;

4.1.2 we gather information about you when you provide it to us, or interact with us directly, for instance engaging with, Dr Michael Craig, our staff or registering on one of our digital platforms or applications;

4.1.3 we may collect or receive information about you from other sources, such as keeping the contact details we already hold for you accurate and up to date using publically available sources; other consultants, referring physicians, general practitioners and with your consent, family members and or friends. and

4.1.4 any personal data you give to us during appointments may also be retained by us.

4.2 When you use our Website, we will automatically collect technical information about the device you use to visit, including your IP address, browser type/version and related settings.

4.3 We also monitor email communications sent to and from us, your use of our Website. This includes the full URLs, your clickstreams through our Website, the pages you view and how you interact with them and how you leave the Website.

4.4 Where you provide services to us, we will take administrative personal data (personal contact details of your personnel or representatives) to enable us to administer our relationship with you, and receive the necessary goods and services from you.

5. What We Use It For

5.1 Your personal data is primarily to enable us to administer our relationship with you and provide you with the appropriate professional care, and referrals and/or to supply you with the appropriate legal services and advice that you have instructed us to provide. We also may use your personal information:

5.1.1 To provide information requested by you;

5.1.2 To manage and administer our relationship with you and other health care professionals;

5.1.3 To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims; and

5.2 Technical information we collect about your visit to our Website is used to enable us to:

5.2.1 personalise and improve its functionality and security (to keep it safe and secure);

5.2.2 Where we change our services, or any applicable terms and conditions, we will contact you.

5.4 Meetings and appointments.

5.5 Legal and other services

We collect, create, hold and use personal information in the course of and in connection with the services we provide to our patients. The information may be disclosed to third parties, with your consent, to the extent reasonably necessary in connection with that work. Please also see 'Who we share your personal information with'.

5.6 We use your personal information on the following bases:

5.6.1 To perform a contract, such as engaging with an individual to provide legal or other services;

5.6.2 For the establishment, exercise or defence of legal claims or proceedings;

5.6.3 To comply with legal and regulatory obligations; and

5.6.4 For legitimate professional purposes.

6. Retention of your personal information

6.1 Your personal information will be retained in accordance with our data retention policy which categorises all of the information held by us and specifies the appropriate retention period for each category of data.

6.2 To determine the appropriate retention period for your personal data, we will 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 those

purposes through other means, and the applicable legal requirements.

6.3 We will also take into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and our professional purposes.

6.5 Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations.

7. Your Consent

7.1 We do not ordinarily rely on your consent to process your personal data. All personal data we take is either to enable us to perform our contract or proposed arrangements with you, to advise you on the matters on which we are instructed, and/or to comply with our legal and regulatory obligations whether under applicable Money Laundering Regulations or otherwise. We therefore consider that all personal data we obtain is reasonable and necessary for these purposes.

7.2 By using our Website and/or working with us, you expressly consent to the transfers of your personal data, to those specifically listed third parties in this policy, for the reasons specified.

7.3 You may exercise your rights under section 10 at any time, which includes withdrawing your consent to our processing of your personal data. However, where this withdrawal prevents us from performing our contract or providing services to you, we may not be able to provide our services to you.

8. Security

8.1 We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable Data Protection Laws.

8.2 Each member of staff has unique log-in details and authentication software requires these to access the systems. Staff have access to personal data only for the purposes of performing their roles and providing the necessary advice.

9. Who Can We Share Your Personal Information With?

9.1 We will not share your personal information without your prior consent unless

9.2 Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

9.2 We do not sell, rent or otherwise make personal information commercially available to any third party.

10. Your Rights

10.1 In relation to all of your personal data, you have the following rights (in addition to any rights you may have under Data Protection Laws) to ask us:

10.1.1 not to process your personal data for marketing purposes;

10.1.2 to clarify what data we hold about you, how it was obtained, to whom it has been disclosed and for how long it will be stored;

10.1.3 to amend any inaccurate data we hold about you;

10.1.4 to delete any of your data (where you no longer think we need to hold it, or you think we have obtained or processed it without your consent at any time); and

10.1.5 to only process your personal data in limited circumstances, for limited purposes.

10.2 We must ensure your personal information is accurate and up to date. Therefore please advise us of any change to your information by emailing us.

10.3 We have the capacity to extract your personal data from our databases and provide it to you in a structured, commonly-used way (typically by file).

10.4 If you wish to exercise any of your rights at any time, please contact us on the details contained at the beginning of this policy in the first instance. We will require you to verify your identity to us before we provide any personal data, and reserve the right to ask you to specify the types of personal data to which your request relates.

10.5 Where you wish to exercise any of your rights, they may be subject to payment of a nominal administration fee (to cover our costs incurred in processing your request) and any clarification we may reasonably require in relation to your request. Alternatively, we may refuse to comply with the request in such circumstances where we

consider (acting reasonably) that your request is excessive, unfounded or repetitive.