

# PRIVACY POLICY

## INTRODUCTION

At 1 World Medical, we respect your privacy and are committed to protecting your personal data. This policy:

- **explains** when and why we collect personal data about you and other people who visit our website; how we use it; the circumstances when we may disclose it to others; and how we keep it secure.
- **only applies** to the collection of your personal data by 1 World Medical and the use of that information by 1 World Medical and those whom we share it with.
- **does not cover third party websites** to which we may provide links, nor does it cover advertisers. They may have their own privacy policies and/or terms and conditions of use which you should review and understand separately.

This privacy policy is provided in a layered format. Alternatively, you can download a pdf version of the policy [here](#). Please read this policy carefully to understand our practices regarding your personal data. You can also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

## WHO ARE WE?

Intelligent PPE Solutions Ltd (t/a 1 World Medical) is the controller of, and is responsible for, your personal data (referred to as **1 World Medical, we, us** or **our** in this privacy policy). When we use the word **you** or **your** in this policy, it means you as a user of the [www.1worldmedical.org](http://www.1worldmedical.org) website, or as a person whose details we collect as part of our PPE order and delivery services.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our data privacy manager using the details set out below:

Dr Anurag Patel  
Data Privacy Manager  
[privacy@1worldmedical.org](mailto:privacy@1worldmedical.org)

### *Third-party links*

This 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 policy of every website you visit.

## WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

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

- Identity Data includes first names, last name, username or similar identifier, title and date of birth.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Transaction Data includes details about payments to and from you and other details of products and/or services you have purchased from us.

- Technical Data includes information about how you use our website including 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 this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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 policy.

## 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 or by corresponding with us by email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or newsletters;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and publicly available sources including:
  - Technical Data from analytics providers, advertising networks and search information providers such as Google.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as your bank or Paypal.
  - Identity and Contact Data from the third parties we link you to such as Paperform and Mailchimp.

### *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 into with you (for example, to provide you with PPE). 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.

## WHAT LAWFUL BASIS DO WE RELY ON FOR PROCESSING 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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal obligation.

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

## HOW DO WE 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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)  (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
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 make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

## ***Marketing***

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## **Opt-out**

You can ask us or third parties to stop sending you marketing messages at any time 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 ordering PPE, registering for an account or other transactions.

## **Cookies**

We use a cookies tool on our website to obtain your consent for the optional cookies we may use. Cookies that are necessary for functionality, security and accessibility are set and are not deleted by the tool.

You can read more about how we use cookies, and how to change your cookies preferences, in our [Cookie Policy](#).

## ***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.

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

## WHO DO WE SHARE YOUR DATA WITH?

We may share your personal data with External Third Parties for the purposes set out in the table at Section 4 (*How Do We Use Your Personal Data?*) and to 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 policy.

We require all third parties that process your personal data on our behalf to respect the security of your personal data, to treat it in accordance with the law and only process your personal data for specified purposes and in accordance with our instructions.

## DO WE TRANSFER YOUR DATA OUTSIDE THE EEA?

We may share your personal data with third parties based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see *European Commission: EU-US Privacy Shield*.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

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.

## HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may

retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## WHAT ARE YOUR LEGAL RIGHTS?

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- **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 your personal data.**

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 particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms, you may do so. 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 your personal data.**

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- 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
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request transfer of your personal data.**

Commonly known as the right to data portability, 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.

- **Right to withdraw consent.**

Where we are relying on consent to process your personal data, such as for direct marketing, you can withdraw that consent at any time. 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.

- **Right to make a complaint.**

You can 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](http://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.

### ***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.

### ***Time limit to respond***

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

### ***Exercising your rights***

If you wish to exercise any of the rights set out above, please contact our Data Privacy Manager (whose details are set out in Section 1 (*Who Are We?*)).

## **CHANGES TO THIS POLICY**

We keep our privacy policy under regular review. This version was last updated on 29 June 2020.

We may update this policy from time to time and will post any changes on our website at [www.1worldmedical.org](http://www.1worldmedical.org). You should check back occasionally and read through it again.

## **GLOSSARY**

In this privacy policy, the following words have the corresponding meaning:

<b>comply with a legal obligation</b>	means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.
<b>external third parties</b>	means: <ul style="list-style-type: none"><li>· service providers acting as processors who provide us with certain services;</li><li>· professional advisers acting as separate controllers including lawyers, bankers, auditors and insurers based in who provide professional services;</li><li>· HM Revenue &amp; Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;</li></ul>

	<ul style="list-style-type: none"> <li>· any other third parties that we may engage from time to time including market researches, fraud prevention agencies;</li> </ul>
<b>legitimate interest</b>	<p>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;</p>
<b>performance of contract</b>	<p>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 into such a contract; and</p>
<b>personal data</b>	<p>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).</p>