



GDPR (PRIVACY) POLICY

General Data Protection Regulations (GDPR)

Surgins.co.uk
Surgins.com



1. Introduction

The **Surgins surgical** (“us”, “we”, “our”, “Surgins Surgical”), is a Company Limited by Guarantee registered in England with company number 6307127 and registered address PO Box 14530 Solihull B91 9LH.

Surgins is the UK manufacturer and suppliers of stainless Steel and Titanium surgical instruments of all surgical disciplines.

Our webpage can be found here: (the “Websites”).

<https://www.surgins.co.uk>,

<https://www.surgins.com>

We are committed to protecting your privacy and will only use the information that we collect about you lawfully. This policy is intended to give you an understanding of how and why we use the information you provide to us both online and by other means.

Please read this policy carefully to understand how we will collect, use and store your data. We may update this policy from time to time without notice to you, so please check it regularly.

2. What information do we collect about you?

We collect personal data about you for a number of reasons, including communicating with you, responding to requests for business, facilitating our new products and relevant business activities.. We also collect information about the use of our website.

The personal data we collect can include:

- a. your full name;
- b. job title;
- c. postal address;
- d. telephone number(s);
- e. email address;
- f. records of your correspondence with us;
- g. record of event attendance;
- h. information you may enter onto the Website; and
- i. information you share with us – such as subjects that interest you.

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j. Log files/IP addresses - When you visit our Site, we automatically log your IP address (the unique address which identifies your computer on the internet). We do not link IP addresses to personally identifiable information.

We may collect this information through our website, or through your e-mail or other communications with us. Non-personal information - we may also automatically collect non-personal information about you such as the type of web browser and version you use or the site from which you linked to this Site. You cannot be identified from this information.

We will never collect sensitive personal data without your explicit consent.

We may use some of your personal information acquired via web analytics platforms to analyse our digital performance, for example to see how our Website can be improved to help us better achieve our purposes.

How will we use the information about you?

We will process your data for the following reasons:

- a. To administer your organisation's details in mutual business activities.
- b. To deliver, Catalogues, Quotations, literature and/or other materials and information you have requested from us;
- d. To circulate information and/or requests for information regarding legislative and policy developments;
- e. Unless you tell us otherwise, we will send you information that we think you may be interested in, including updates on Surgins's work, and training;
- f. For our own internal administrative purposes and to keep a record of your relationship with us;
- g. to manage your communication preferences;
- h. to solicit your views, for example, via surveys about current services offered by Surgins or of potential new services which may be offered;
- i. to carry out research to find out more information about our Customers' interests; and
- j. To comply with applicable laws and regulations, and requests from statutory agencies.



lawful basis that we rely on for processing your data will depend on the personal information concerned and the specific context in which we collect it, but is either where:

- a. you have provided your consent to us using your data in a certain way;
- b. it is necessary so that we can comply with a legal obligation to which we are subject;
- c. it is necessary so that we can perform our obligations under a contract with you; or
- d. there is a legitimate interest in us doing so.

“Legitimate interests” means the interests of Surgins in running the business and the promotion of our products and promote the interests of the health-tech industry. It can also apply to processing that is in your interests, for example in cases where you have requested information or certain goods from us.

When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws, and make clear to you at the relevant time what the legitimate interests are. We will 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).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the details provided under the "How to contact us" heading below.

4. Will we share this information with others?

Certain Surgins services are offered in conjunction with business partners or government partners. In such cases we may need to share your personal information with them for the purpose of administering and delivering the service (for example in order to process payments for sale).

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Please note that certain services may be unavailable if you do not want to disclose the personal information you are asked for.

If at any future time you do not wish us to share your information in this way, then please send an email to info@surgins.co.uk

We do not share, sell or rent your information to third parties for marketing purposes. We will not otherwise disclose your personal information unless required to do so by a regulatory agency or law.

5. How do we protect the security of personal data?

We aim to ensure that there are appropriate physical, technical and managerial controls in place to protect your personal details.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We encourage you to review the privacy statements of websites you choose to link to from the Website so that you can understand how those sites collect, use and share your information. Surgins is not responsible for the privacy statements or other content on sites outside of the Website.

6. International Data Transfers

The information we collect from you may be transferred to and processed and/or stored at a destination outside the European Economic Area (“EEA”). If we send your personal data outside the EEA we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your information. By providing any information, including personal information, you confirm you understand such transfer, storage, and processing.



7. For how long do we keep your data?

We will keep your personal data for no longer than is necessary for the purposes for which it is processed.

If you request to receive no further marketing contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for

example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. What if you have questions or need to make corrections to your information?

9.

You may, of course, **decline to share certain information** with us, in which case we may not be able to provide you some of the features and functionality of our website.

You have the right to **request details of the information that we hold about you**. If you would like to do so please contact us using the details below.

We also want to make sure that your personal information is accurate and up to date. Please let us know if your details change. We may also use publicly available sources to keep your records up to date (e.g. checking against websites). You may also ask us to **correct or remove information** you think is inaccurate. You may also **request portability** of your personal information.

You can also **opt-out of receiving all or some of our marketing communications** or request that we stop processing data about you for certain purposes at any time by contacting us using the details below.

If we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to



your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are unhappy with the way in which we have handled your personal data please contact us using the details below.

You are also **entitled to make a complaint**

to the Information Commissioner's Office: <https://ico.org.uk/concerns/>.

(Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available here).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

9. **Changes to this Policy**

We may update this policy from time to time without notice to you, so please check it regularly. The privacy policy was last updated on 20 May 2018.

10. **How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you:

Email: info@surgins.co.uk

Post: Surgins Surgical PO Box14530 Solihull B91 9LH



Surgins Cookie Policy

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. 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.

How we use cookies

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage 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. This may prevent you from taking full advantage of the website.