

## **Felgains Ltd Data Protection Privacy Notice Client Information**

The Directors and management of Felgains Ltd, located at 33 Knightsdale Road, Ipswich are committed to compliance with all relevant UK and EU laws in respect of personal data, and to protecting the "rights and freedoms" of individuals whose information Felgains collects, our clients, in accordance with the General Data Protection Regulation (GDPR).

### **Topics**

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## **1. What information we collect about you**

We collect personal information about you when you access our website, open an account with us, contact us, purchase products or services, respond to customer surveys, register for marketing communications or participate in competitions.

We collect this personal information from you either directly, such as when you purchase products or services, or indirectly, such as your browsing activity while on our website (see 'Cookies' below). If you intend to provide us with personal information about other people, you must make sure that they have seen a copy of this privacy notice and are comfortable with you giving us their information.

We also collect personal information about you from other sources as follows:

- Technical data (for example analytics or search information providers)
- Contact, financial and transaction data (for example technical, payment and delivery services)
- Identity and contact data (for example data brokers or public sources)

The personal information we collect about you depends on the activities we are carrying out, and can include:

- Your name, work address and contact details
- Company Bank details
- Details of any feedback you give us by phone, email or post
- Information about the products and services we provide to you

We use this personal information to:

- Create and manage your account with us
- Verify your identity
- Provide products and services to you
- Customise our website and its content to your preferences
- Improve our services

Special Category Data:

We take client information from health professionals (such as Occupational Therapists) to ensure our equipment is appropriate for clients before carrying out product trials or assessments and supplying equipment. Information taken can include the client's condition, weight and height.

## **2. Our legal basis for processing personal information**

We process your personal information for a number of legitimate interests, including managing our relationship with you, marketing our products, and to help us improve our services and products. The reasons are listed as follows:

1. To comply with our contractual obligations (i.e. provide the service, collect payment)
2. To comply with our legal obligations (including tax and revenue record keeping, health & safety compliance)
3. In the event of any legal claims arising out of the services we provide
4. Marketing activities that are in the interests of contacts/clients
5. We have obtained active consent to send marketing materials to consumer contacts and clients
6. To ensure the products that we are supplying are suitable for the end user

### **3. How we use the information collected about you**

We will use the information you provide in order to provide the services you have requested while ensuring personal data will be processed in a manner that ensures its security.

We keep your personal information for various periods of time according to the following:

- How long it is reasonable to keep records to meet our obligations to you and by law
- Length of times on warranty
- Length of time advised by law or recommendations by professional bodies
- The product or service purchased from us, and how long you have been a customer with us

We may seek your consent to keep information relating to a project we have completed on your behalf for a longer period. This would be with the intention of using the information to demonstrate our competence and quality of our work to other interested parties.

We may use images of a project we have completed on your behalf for promotional purposes. If images feature people, we may contact you to seek consent from the people who feature in the images.

### **4. Transfer of your information out of the EEA**

We deal with global organisations so personal information may be transferred to countries outside the European Economic Area (EEA) for the purposes set out in this privacy notice.

Not all countries outside the EEA have data protection laws that are similar to those in the EEA and if so, the European Commission may not consider those countries as providing an adequate level of data protection.

We take steps to make sure that, when we transfer your personal information to another country, appropriate protection is in place, in line with data protection laws. Often, this protection is set out under a contract with the organisation who receives that information.

### **5. Marketing**

We may reach out to you via your business email address, business phone number or company postal address, if these details are publicly available. If you would like to opt out of these communications, please contact us at [customerservices@felgains.com](mailto:customerservices@felgains.com).

### **6. Data Subjects' rights**

Unless subject to a statutory exemption that is current and applicable, Data Subjects have the following rights regarding data that is recorded and processed:

- The right to request a copy of your personal data which Felgains holds;
- The right to request that Felgains corrects any personal data you find to be inaccurate or dated;

- The right to request that your personal data is erased in the case that it is no longer necessary for Felgains to retain;
- The right to withdraw any consent to the processing of your personal data that you may have given, at any time;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request that a restriction is placed on further processing;
- The right to object to the processing of personal data;
- The right to lodge a complaint with the Information Commissioners Office.

Access to your information and corrections/changes:

If you would like to know what information we hold about you please write to us using the contact details below. We will usually supply copies of the information held within 30 days of receiving your request.

Please notify us if any of the information we hold about you has changed or is incorrect, we will be happy to update this for you.

## **7. Third parties**

We may need to provide certain third party organisations with your information in order to provide our services.

We will only provide them with the information they require and will permit them to use the information for the required purpose only.

If any such third party has used your information for any other reason without your consent please notify us using the details below and we will investigate the matter.

The third parties we anticipate sharing your information with include:

1. Third party contractors and suppliers (e.g. subcontractors, courier services)
2. Our accountants for tax and revenue accounting
3. HMRC for tax and revenue purposes
4. The Health and Safety Executive for the purposes of health & safety reporting and compliance

## **8. Cookies**

Our website uses cookies, which are text files that record information about how you interact with our website. Further information can be found in the cookie policy which is on our website: <https://www.felgains.com/cookie-policy>

## **9. Complaints**

We strive to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate please bring it to our attention. We would also welcome any suggestions for improving our procedures. You may report any concerns regarding the way in which we have handled your personal data to the

Information Commissioner on 0303 123 1113 or by using this link  
<https://www.ico.org.uk/concerns>.

#### **10. How to contact us**

If you wish to contact us about any of the above content, or wish to receive a hard copy of this Policy, please do so on the following contact details.

Email Address: [barry@felgains.com](mailto:barry@felgains.com)

Postal Address: Felgains Ltd, 33 Knightsdale Road, Ipswich, IP1 4JJ

#### **11. Changes to this Privacy Notice**

We keep this privacy notice under regular review and will post details of any changes below. This privacy policy was last reviewed on 10<sup>th</sup> October 2018.

We have made the following changes to this Privacy Notice

<b>Date</b>	<b>Change</b>
18 <sup>th</sup> October 2018	Updated by Barry Tunley