

Joerns Healthcare is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you or a customer can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy policy.

This privacy policy sets out how Joerns Healthcare collects, processes and protects personal data both relating to you and any customer, when you use this website, contact us by phone, by email, sign up to any of our mailing lists or take part in any competitions. It also covers the rights you have over this information.

Joerns Healthcare may change this policy from time to time by updating this page. You should check this page periodically to ensure that you are happy with any changes. This policy was last updated on 24th May 2018.

WHO ARE WE?

We are Joerns Healthcare Limited and are registered in England and Wales under company number 05859837. Our registered office is located at Drakes Broughton Business Park, Worcester Road, Drakes Broughton, Pershore, Worcestershire, WR10 2AG. Our VAT number is GB 890 1918 07. You may contact us by post at the above address, by email at info@joerns.co.uk or by telephone on +44 (0)844 811 1156.

For the purposes of data protection laws in the UK, the data controller is Joerns Healthcare Limited. We are registered as a data controller with the Information Commissioner's office under number Z9728094.

If you would like to make an enquiry about our use of your personal data, you can do so by writing to Joerns Healthcare Limited at the above address or by email to info@joerns.co.uk.

WHAT PERSONAL DATA DO WE COLLECT?

We collect and process information about you in the following ways:

INFORMATION YOU PROVIDE TO US

This is information about you that you provide to us by the following means:

Requesting information about a product or service by phone, email, at a public event such as a trade show, or on our website

Completing a contact form on our website

Replying to one of our marketing campaigns or competitions (e.g. filling out a response card)

Registering to attend a Joerns training course

Registering for an online Joerns Resource Centre or Oxford Sling Selector account

Requesting to receive marketing and promotional communications (e.g. subscribing via our website or filling out a form at a trade show event)

Corresponding with us by phone, email or by other means

Participating in surveys, competitions or prize draws

Depending on the services you use on the Joerns Healthcare website, the information you provide us with may include your name, email, mailing address, phone number, date of birth, company name, and company account code.

You may decide to supply Joerns Healthcare with other personal data when you contact us (for example when you send us an email or call our customer services department). If we request personal data during our correspondence with you, we will explain why we require this information and what we intend to do with it.

If you intend to provide personal data to us on behalf of someone else, you must ensure that they have been provided and agree with this privacy policy before doing so.

You can visit the Joerns Healthcare website without providing any personal data.

INFORMATION WE COLLECT ABOUT YOU

When you visit our website, we automatically collect the following information:

Device Information:

This includes information from or about your computer, phone or other device that you access our website from. Examples of the device information that we collect includes your operating system, IP address, browser type, device type and date and time of your visit.

Information about your visit:

We collect how you use and interact with our website during your visit. This includes the pages you visit, the products or services you enquired about, clickstream to, through and from our website (including the date and time), what you searched for, page response times, how long you visited, advertising identifiers and page interaction information (for example what was clicked).

Depending on the consent that you give us, this information may or may not be associated with you. If you have consented to receive email communications from us, we will also record information regarding your interaction with it (such as whether you open, click on a link or forward the email message). If you do not want us to collect this information, you can unsubscribe from receiving email communications using the unsubscribe link contained in the email.

We do not collect any personal data about you from third-parties.

CHILDREN UNDER 16

If you are under 16 years of age, please do not provide us with any personal data. Our website is not intended for or targeted at children under the age of 16, and we do not knowingly or intentionally collect information about this demographic. If you believe that we have collected information about a child under the age of 16, please contact us using the information found under “Who Are We”, so that we may delete this information from our records.

THE NEED TO PROCESS YOUR PERSONAL DATA

This section explains how and why we process your personal data, as well as the legal basis for which we carry out this processing.

When opting in to receive permission-based communications by email:

Where you have subscribed to receive email communications from Joerns Healthcare about products, services, promotions, news, events and resources, we will process your personal data to enable this. Our legal basis for processing your personal data in this way is consent. You can withdraw your consent at any time by following the unsubscribe link in any of the email communications you receive from us.

To provide you with product and service information on request:

If you ask us to provide product or service information to you by email, it is necessary to process your personal data in this way for the performance of a contract with Joerns Healthcare. This involves moving your personal data through our communication technology to generate the email and send the information to you. We need to process your personal data in this way to enable this.

When requesting a product demonstration or trial:

Where you ask us to arrange a product demonstration or trial, it is necessary to process your personal data in this way for the performance of a contract with Joerns Healthcare. This involves sending you emails in relation to your request (e.g. acknowledgements, reminders and evaluations) and contacting you either by phone or email to arrange your requested demonstration or trial.

Product demonstrations may be supplied by one of our authorised service providers. When we contact you to arrange a demonstration or trial, we will inform you of the Joerns Healthcare service provider who can handle your request and seek your consent to pass your personal data to them. We disclose only the personal data that is necessary to deliver your fulfil your request. Our legal basis for processing your personal data in this way is consent.

When enrolling on a Joerns Healthcare training course

If you request to attend a Joerns Healthcare led training course, it is necessary to process your personal data in this way for the performance of a contract with Joerns Healthcare. Our use of your personal data in this way includes passing your personal data through our in-house software to administer your booking (e.g. generating emails to confirm your booking, sending reminders and collecting feedback). We need to process your personal data to enable this

To respond to and answer general enquiries:

If you submit an online enquiry or send us an email, we need to process your personal data in order to respond to you. At times, we may need to pass your personal data to other internal departments to help with, or respond to your enquiry. These departments are not authorised to use or disclose your personal data other than in accordance with this policy

If you intend to send sensitive information (e.g. a disability or medical condition) it is advisable to contact us by telephone as opposed to email or via our website. It is necessary to process your personal data in this way for the performance of a contract with Joerns Healthcare.

When registering for and managing your online Joerns Resource Centre or Oxford Sling Selector account:

If you are an authorised Joerns Healthcare service provider and apply for an online Resource Centre account or register for an Oxford Sling Selector account, we need to process your personal data in order to create and maintain your account and to verify that you are an authorised Joerns Healthcare service provider. We use your personal data in order to send you emails about forgotten passwords, notification of critical maintenance and service outages as well as account de-activation. Our use of your personal data in this way includes passing your personal data through our communication technology to generate the email. It is necessary to process your personal data in this way for the performance of a contract with Joerns Healthcare.

When taking part in a competition or prize draw:

If you submit your personal data for the purposes of entering a competition or prize draw (e.g. at a tradeshow or event), we will need to process your personal data in order to provide this service to you. Our reason for doing so is for the performance of a contract with Joerns Healthcare.

To tailor your online and email experience:

Our genuine interest for processing your personal data in this way is to provide you with a more personalised experience when you visit our website or receive email communications from us. We may use your personal data to make sure the website or an email communication is displayed in the most suitable way for the specific device you are using, or highlight products or services you may have previously expressed an interest in.

To improve our website(s):

We use third-party cookies such as Google Analytics to help us improve our website by gathering information on usage trends and user preferences when visiting our website. These cookies collect information in an aggregate form. Our genuine interest for processing your personal data in this way is to provide you with a better website experience.

To ensure our website(s) remains secure:

Our genuine interest for processing your personal data in this way is for the purpose of maintaining or improving the security of our website. This may involve us using your IP address to block you from accessing our website if we deem your actions to be unduly disruptive or illegal. We also use it for general website administration purposes as well as for internal operations including trouble-shooting, market research, testing and data analysis.

When unsubscribing from a mailing list:

If you unsubscribe from a Joerns Healthcare mailing list, we will process your personal data to transfer you to a suppression list. This involves holding on to limited personal data (e.g. your email address). Our genuine need for processing your personal data in this way is to ensure email communications are no longer sent to you following your unsubscribe request.

To create and analyse data:

We will process your personal data into an aggregate form where it can be utilised for reporting purposes (e.g. to measure the success of advertising campaigns or the number of visitors to our website). Our genuine interest for processing your personal data in this way is to evaluate the effectiveness of our marketing campaigns.

In the event our business transfers ownership:

If we purchase or sell any business or assets, we will disclose your personal data to the prospective seller or buyer of such business or assets in accordance with all applicable data protection laws or if Joerns Healthcare or its assets are acquired by a third party, personal data held by us will be one of the assets where ownership is transferred to the purchaser.

Our genuine interest for processing your personal data in this way is to ensure the business and relative service can be continued by the purchaser. If you have any objections to your personal data being used in this way, the relevant seller or buyer of our business may not be able to provide the necessary services to you.

WHAT ARE YOUR RIGHTS?

The right to access:

You have the legal right to receive confirmation as to whether your personal data is being processed by us, as well as understanding how we use your personal data. Additionally, you have the right to request access to your personal data that we process.

The right to object:

You have the legal right to object to our processing your personal data where we are processing your personal data based on our genuine interests (outlined above) or you can show that your interests, rights and freedoms regarding your personal data outweigh our interest to process it. If you request that we cease processing your personal data on this basis, we will stop unless we can demonstrate compelling grounds as to why the processing should continue in strict accordance with data protection laws.

The right to withdraw consent:

If you have provided us with your consent to use and process your personal data (e.g. to receive product information), you may withdraw your consent at any time either in writing or via the 'Who Are We' section of this policy. If you do choose to withdraw your consent, this does not mean our processing of your personal data prior to you withdrawing your consent, was unlawful.

Where consent relates to email communications specifically, you can exercise your right to withdraw consent simply by following the 'Unsubscribe' link in the email. If you request to be emailed product information, make a course reservation, lodge an enquiry or register for a Resource Centre or Oxford Sling Selector account after unsubscribing, you will continue to receive emails about your request even if you have opted out of receiving email communications to ensure we can respond to your request.

The right to update your data:

You have the legal right to request that we correct or update any personal data we hold about you, and have incomplete personal data made complete, by providing it to us. If you have registered for a Joerns Resource Centre or Oxford Sling Selector account, you can update your contact information and preferences at any time by accessing your account settings page on each site.

Right to have your data deleted:

You have the legal right to request that we delete any personal data which we are processing if at least one of the following applies:

The processing is no longer necessary in relation to the purposes for which your personal data was collected for initially.

Our processing of your personal data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can rely on to process your personal data.

You object to the processing of your personal data as set out in 'The right to object' section of this policy and we have no overriding or genuine interest processing your data.

The personal data has been unlawfully processed and deletion is required for compliance with a law to which we must abide.

The right to data portability:

You have the legal right to request and receive your personal data that you have provided to us in a structured, standardised, machine readable format and the right to transmit such personal data to another controller if the legal basis for processing your personal data is for the fulfilment of a contract and/or consent.

The Right to restriction:

You may ask us to restrict our processing of your personal data where:

The accuracy of the personal data is contested by you.

Our processing of your personal data is considered unlawful (but you do not want such personal data deleted)

We no longer have a requirement to process your personal data for the agreed purposes (but you want to preserve your personal data for the establishment, exercise or defence of a legal claim or dispute)

We are processing your personal data on the basis of our genuine interest, you object to our processing on this basis and you want processing of said personal data to be restricted until it can be determined that our genuine interest overrides your genuine interest.

Where your exercising of your right to restriction determines that our processing of your personal data is to be restricted, we will then only process the relevant personal data in accordance with your consent, for storage purposes and for the purpose of any legal claim or dispute.

Automated Decision Making

Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right to request that Joerns Healthcare:

Provide you with information relating to our processing of your personal data for automated decision making purposes.

Instigate human intervention or challenge a decision where processing is done solely by automated processes.

Carry out regular checks to ensure any of our automated decision making processes are operating as they should be.

Exercising your rights:

Should you wish to exercise your rights, you can contact us using the information in the 'Who Are We' section of this policy. Please note that while any changes you make will be reflected in active user databases instantly, we may retain all information you submit for the purposes of backup, archiving, fraud prevention, abuse, analytics, suppression, or where we otherwise reasonably believe that we have a genuine or legally binding reason to do so.

Please be aware, some of these rights only apply in certain circumstances, therefore we may not be able to fulfil every request.

WEBSITE COOKIES

In order to collect some of the data described above, we employ and utilise cookies on our website.

Cookies are small pieces of data that a website sends to a user's computer and are saved to your device to allow that website to record your interactions and recognise you when you visit again. This allows us to provide you with a tailored, more efficient experience when visiting the one of our websites. Cookies are either session-based (e.g. they only last until you close your internet browser) or persistent (e.g. they remain on your computer for a pre-determined amount of time or until you physically delete them). Joerns Healthcare utilises persistent cookies to remember you when you return to our website or to track your navigation and activities when visiting our website. We may associate personal data with a cookie in those instances.

During your visit to one of our websites, you may notice some cookies that are not related to us. These may include Facebook, Google and YouTube among others. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them. You can opt out these third-party cookies on the Joerns Healthcare website by changing your cookie preferences within your browser.

DO WE SHARE YOUR PERSONAL DATA WITH ANYBODY ELSE?

We will only use your personal data within Joerns Healthcare for the purposes for which it was initially obtained. We will not, under any circumstances, share or sell your personal data with any third party for their own marketing purposes, and you will not receive marketing from any other companies or other organisations as a result of giving your personal information to us. However, there are some situations where we use trusted and authorised providers to help us with administration of the services you have asked us to supply. These may include:

Third-party product providers:

We may need to share your personal data with third-party product providers (e.g. authorised service providers) to enable us to deliver your product or respond to a specific request. Our authorised service providers will only act under our instruction and we have a contract in place with them that requires them to keep your information secure and to only use it for the reason it was collected. We will always provide you with the name of the authorised Joerns Healthcare service provider prior to communicating your personal data and require your consent either verbally by phone or by email in order to do this.

Other Joerns Healthcare operations

If your enquiry originates from a different country, we may communicate your personal data to the relevant Joerns Healthcare operation or facility responsible to help with your request. Unless they provide you with their own privacy policy, they may only use your personal details for the purposes explained in this policy.

There may be certain circumstances that require us to disclose or share your information without your consent, for example if we are required to do so by the police, the courts or for any other legal purpose.

DATA PROFILING

We may profile your personal data to help us to personalise your website experience and provide you with email communications to help prevent unwanted communications from filling up your inbox. You can object to such use of your personal data for profiling at any time by contacting us at the details set out in the 'Who Are We' section of this policy. This section explains how and why we use personal data to better understand our visitors and subscribers and to provide you with an improved experience.

Segmenting:

We may analyse visitor data to identify common characteristics and preferences. We do this by assessing various types of information including behaviour (e.g. products you have asked about, or demographic information, such as occupation). By grouping people together based on common characteristics, we can help to ensure you see and receive only the information most important to you. This in turn helps ensure we aren't wasting resources in contacting you with information that isn't of interest.

Helping us to understand your interests:

We assess the interests of visitors to our website (e.g. we monitor the products and services you have visited or enquired about and marketing campaigns you have responded to). Based on the information you have provided to Joerns Healthcare, if it appears you may be interested in learning more about a product or service, we may contact you by email or personalise our website pages to promote or highlight it to you.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We only retain personal data submitted via our website for the following periods, unless otherwise required by law:

Where we have built a profile of your interaction with us (e.g. the products and services you have enquired about and/or the pages you have visited), we will keep your personal data for up to two years from the last time you used or interacted with our website.

The personal data you provide us with when requesting product information will be retained for up to 5 days, for auditing and administration purposes.

Personal data you submit to us when enrolling on a Joerns Healthcare led training course may be retained indefinitely after the course date, for auditing and administration purposes as well as evidence of your successful attendance and authorised training.

Personal data you submit to us when requesting a product demonstration or trial will be retained by Joerns Healthcare for 12 months after the scheduled demonstration or trial date to deal with any queries in relation to your request.

Personal data you provide to us when making an enquiry via email will be retained for up to 2 years from the last date of your interaction with us, for administration purposes.

Personal data you provide to us when entering a competition or prize draw will be kept for 1 month after the closing date unless your consent otherwise given.

If you have a Joerns Resource Centre or Oxford Sling Selector account, we retain your personal data for as long as the account remains active.

If you have subscribed to receive email communications, we retain your personal data for as long as you are subscribed. If you submit a request to no longer receive such communications, you will be unsubscribed. If you unsubscribe, we will keep your email address recorded on a suppression list to avoid you receiving further email communications from us.

In those instances where you have provided consent to receive email communications alongside your request (for example if you requested product information and consented to receive email communications) we will retain your name, job title, email address and country. All other un-necessary personal data will be deleted.

If required to do so by law, or if it is reasonably necessary to meet any regulatory requirements, resolve disputes, prevent fraud, abuse or enforce our Terms and Conditions, we may also retain some of your personal data for the applicable period during which claims may be raised (the statute of limitations), or for

any mandatory retention period. This applies even after you have closed your account or it is no longer needed to provide the services to you.

HOW DO WE KEEP YOUR PERSONAL DATA SAFE?

All personal data that you provide to Joerns Healthcare is stored on our secure servers in the United Kingdom. We use a variety of security techniques, including encryption and authentication, to ensure we protect and maintain the availability, security and integrity of your personal data.

Please remember that data transmission over the internet is not guaranteed to be secure. Joerns Healthcare is committed to protecting your information in accordance with data protection requirements. These include:

Limiting access to your personal data to those who need to use it for the relevant purpose.

Storing your personal data in encrypted form.

Preventing unauthorised access to IT systems through the use of firewalls.

Permanent monitoring of IT systems to detect and prevent misuse of personal data.

If you have a Joerns Resource Centre or Oxford Sling Selector account, you will have a username and password that enables you to access the relevant online area. You are responsible for keeping this username and password confidential. We ask that you do not share your username and password with anyone.

UPDATES TO OUR PRIVACY POLICY

We may periodically change this Privacy Policy. If we do, we will post the revised version on our website and adjust the effective date in this document before such changes take effect. If we make any changes to this privacy policy that impact how and why we process your personal data, we will notify you by email.

THE RIGHT TO COMPLAIN

You have the right to complain about our use of your personal information. If you are unable to resolve the issue to your satisfaction with us, you may contact the Information Commissioner's Office via their website at www.ico.org/concerns. Alternatively, you may write to them at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF