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## PRIVACY POLICY

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### BACKGROUND:

Yorbl Digital Health & Care Solutions Ltd (Yorbl) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our Clients/Customers, Partners, Suppliers, Employees and other valued Contacts and will only collect and use personal data in the ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. Information About Us

Company Name: Yorbl Digital Health & Care Solutions Ltd

Company Type: Private Limited Company - Registered in England under company number 15440831.

Registered address: Mills House, Mills Way, Amesbury, Wiltshire, SP4 7AU

VAT number: 365 7222 87

Data Protection Officer: Tanya Reed-Forrester.

Email address: [tanyarf@yorcoms.net](mailto:tanyarf@yorcoms.net).

Telephone number: 0330 122 1091.

Postal Address: Mills House, Mills Way, Amesbury, Wiltshire, SP4 7AU

We are regulated by Ofcom and are a Participating Member of the OmbudsmanServices.

### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.



#### **4. What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

#### **5. What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Status;
- Home Address;
- Personal Email address;
- Home Telephone number;
- Mobile Telephone number;
- Business name;



- Business Address
- Job title;
- Profession;
- Business Telephone Number;
- Business Fax Number;
- Business Email Address;
- Payment information;
- Personal Medical Information

## **6. How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Providing and managing your account.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by contacting [marketing@yorbl.com](mailto:marketing@yorbl.com) or writing to us at our registered address given above.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## **7. Where do we get your information from?**

We collect information mainly when you sign up with us, contact us and when you use our products and services. For example when you:-

- Register as or enquire about becoming a Yorbl customer or take part in market research.
- Get in touch with us to ask something.
- Buy from us – whether it's online, over the phone or somewhere else.
- Enter any surveys, promotions, competitions or prize draws.
- Make changes to or close your Yorbl account.
- Go to our website, or the sites of any of Yorbl subsidiary brands or companies or Sites used for market research purposes.
- Submit content, including photographs, or comments to participate in discussion threads.



- Use any of our WiFi or Broadband products and services.
- Sign up for a service with us that means we need to check with credit reference and fraud prevention agencies.
- Apply for a job with us online.

We also collect information from other sources, including business directories and other commercially or publicly available sources. If we need to conduct a credit check, we will receive information from credit reference agencies. If you take part in market research for us we will also collect information from third party website or social media you access from our Sites, in accordance with the privacy policies of those respective websites and social media.

#### **8. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- As long as you are using our services and products. This is essential for support purposes.
- As long as you remain “Opted In” or “Subscribed” to any Yorbl Newsletters, Marketing Communications etc.

#### **9. How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

#### **10. Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.



## 11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “Subject Access Request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Tanya Reed-Forrester):

Email address: [customerservices@yorbl.com](mailto:customerservices@yorbl.com)

Telephone number: 0330 120 1520.

Postal Address: Mills House, Mills Way, Amesbury, Wiltshire, SP4 7AU

## 13. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on [www.yorbl.com](http://www.yorbl.com)

## Review

This policy will be reviewed to respond to any changes and on a yearly basis unless required to do so by changes in legislation, the evidence-base or new technologies.

## Implementation of Policy

This Policy shall be deemed effective as of the 10/11/2020. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved & authorised by:

Name: Tanya Reed-Forrester

Position: Director of Internal Services

Date: 10/11/2020



Due for Review Date: 10/11/2023

Version	Status/Changes	By	Date
V0.1	Document Created	Tanya Reed-Forrester	10/11/2020
V0.2	Document adjusted/Name changed	Rebecca Lee	09/07/2021
V1.0	All references to Yorcoms changed to Yorbl Technologies Limited  Registered Company, subscription cancellation and Subject Access Request Addresses changed  "Personal Medical Data" added to Clause 5.	Peter Reed-Forrester	21/06/2023
V1.1	Yorbl Technologies Ltd company name changed to Yorbl Digital Health & Care Solutions Ltd  Registered address changed  Registered company number changed	Katherine Robbins	28/03/24