# **Privacy Policy**



# Axon Beal Ltd t/a Clark Dental Sales Privacy Policy

Last Updated: 17<sup>th</sup> July 2018

This Data Protection and Privacy Statement (the "Privacy Policy") sets out how we, Axon Beal Ltd t/a Clark Dental Sales handle Personal Data that we process when you purchase a product from us, visit our webpage, apps and other services, including events, that refer or link to this privacy (each, a "Service) request information, register on the website, communicate with us through social media, or in connection with an actual or potential business or employment relationship with us (together "data subjects").

Irrespective of any branding used on the website, the Axon Beal Ltd t/a Clark Dental Sales legal entity that owns or administers the Service, as identified therein, is the primary controller of your personal information provided to, or collected by or for, the Service, in any event, you may contact us at the address below.

# Questions about this privacy statement

If you have any questions or comments about this Privacy Statement, Axon Beal Ltd t/a Clark Dental Sales privacy practices, or if you would like us to update information or preferences you provided to us, please contact us at

Email: <u>jayne.beal@clarkdentalsales.co.uk</u> with "FAO: Data Protection Officer" in the subject header (the "Data Protection Contact"),

# Types of personal data we process/collect

We collect information about you in three ways: directly from your input, through the Services technologies, and from third party sources e.g. for events this can include collecting your data from registration forms, badge/business card scanners, and other event related apps.

- 1. The types of information we may hold about you include:
  - a) Contact information (such as name, postal or email address, and phone number);
  - b) Business contact information (such as job title, department and name of organization);
  - c) Professional information (such as experience with Axon Beal Ltd t/a Clark Dental Sales);
  - d) Payment details (including payment card number, expiration date, and billing address postcode);
  - e) Shipping information (including the shipping address, phone number);
  - f) Information you choose to provide in connection with an employment application (such as gender and ethnicity); and
  - g) Information generated by us in the course of managing our relationship with you, such as a history of our interactions with you, your purchases from us and information about your use of our services;
  - h) Other information as necessary for our continued relationship.
  - i) Any information that you choose to upload to our cloud backup service as part of our software support package.
  - j) Other account or event registration and profile information, such as educational and professional background and for events dietary and accessibility requirements.

In the European Union (**EU**), "personal data" is defined very broadly and includes any information relating to a natural person, who can be identified, directly or indirectly, from data that we hold about them or from data that is combined with other information. It may include data relating to our employees, customers, patients, shareholders, contractors or the staff of our suppliers, visitors to our buildings or website users.

# Purposes for which we process personal data

2. Axon Beal Ltd t/a Clark Dental Sales need to process a certain amount of Personal Data about you for a variety of purposes. Axon Beal Ltd t/a Clark Dental Sales will only process your Personal Data in accordance with applicable law which may include:

- a) Manage our business relationship with you, for example: (i) process your transaction; (ii) manage and maintain your account with us; (iii) respond to your questions and comments and provide customer support and quotations. Comply and meet with our legal obligations and applicable law, resolve disputes and enforce our agreements. Protect the rights, property or safety of Axon Beal Ltd t/a Clark Dental Sales, our users, employees and others;
- b) Marketing, advertising and public relations, for example: (i) marketing our business and products to you; (ii) provide you with information you have requested about our company, our products and our services; (iii) provide you with information about, or samples of, our product range for marketing purposes; (iv) contact you through email, telephone or postal mail; deliver targeted advertisements, promotional messages, notices and other information related to the Service, your interests and other products, events and services; For events: to include your professional details on delegate booklets, badges, passes, place cards, guest lists, seating charts.
- c) **Maintenance and statistics**, for example: (i) help diagnose problems with our server; administer the website, and compile broad statistical data; (ii) update and maintain our website;
- d) **Recruitment purposes**, for example; (i) evaluate your interest in employment and contact you regarding possible employment with Axon Beal Ltd t/a Clark Dental Sales (ii) process your application, monitor recruitment statistics, and comply with government reporting requirements; and
- e) **Compliance, legal, regulatory and ethical purposes,** for example (i) enforce our Terms of Use or other legal rights; (ii) comply with applicable laws, regulations and requests from governmental agencies; (iii) and comply with industry standards and our policies;
- f) **Research and product development**, for example we may use information about your experience of using our products to help us improve our products.

#### Legal ground for processing the personal data

- 3. EU Data protection law requires us to have a legal basis before processing any Personal Data about you. The legal basis' for us processing your Personal Data for the above purposes may be because: (i) you have provided your consent; (ii) it is necessary for the performance of a contract with you; (iii) the processing is necessary for our compliance with a legal obligation; or (iv) the processing is in our legitimate interests of operating and promoting our business.
- 4. To the extent provided by applicable law, you may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of your Personal Data. In some circumstances, withdrawing your consent to Axon Beal Ltd t/a Clark Dental Sales use or disclosure of

your Personal Data will mean that you cannot take advantage of certain Axon Beal Ltd t/a Clark Dental Sales products or services.

# Disclosure of information relating to data subjects

5. We intend to keep your Personal Data confidential, in compliance with our legal obligations. We do not sell, rent, trade or otherwise disclose this information to third parties, other than as described in this Privacy Policy, for the purposes described above, or as we disclose to you at the time the data is collected. We may disclose your Personal Data in accordance with, and where permitted by, applicable law:

- to our subsidiaries, branches or associated offices;
- in order for us to comply with our legal obligations, e.g. where we are required to disclose certain information to tax authorities;
- to protect the security or integrity of our business, including our databases and systems;
- to any of our outsourced service providers, suppliers or distributors to facilitate the provision
  of contracted services or goods or to provide expanded services to our customers and website
  visitors, for example; outsource the processing of certain interactive website functions,
  administering email services, running special promotions;
- for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event; and
- to any other third party where you have provided your consent.

# Security measures used to protect the personal data

6. Axon Beal Ltd t/a Clark Dental Sales will take appropriate physical, technical and organisational security measures designed to safeguard and secure any information you provide to us.

#### International transfer of personal data

7. We may disclose or transfer your Personal Data to a third party in countries outside the country in which it was originally collected for further processing in accordance with the purposes set out in section 1 above. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by organizational, technical, contractual and/or other lawful means. You may be entitled under applicable law to receive a copy of the safeguards which we have put in place to protect your Personal Data and privacy rights; please get in touch with the Data Protection Contact for further information on how to exercise this right.

# Retention of personal data

- 8. Your Personal Data will be retained for the duration of our business relationship and for a period of time thereafter as required by applicable local law or where we have a legitimate and lawful purpose.
- 9. Axon Beal Ltd t/a Clark Dental Sales will retain applications of unsuccessful candidates for a reasonable period after the application process to enable us to contact you if another suitable position arises or to comply with our legal obligations.

# Data subject rights

- 10. Data protection laws often provide individuals with numerous rights, including the right to: access, rectify, erase, restrict and object to the processing of, their Personal Data. Individuals may also have the right to lodge a complaint with the local data protection authority if they believe that their Personal Data is not being processed in accordance with applicable data protection law. If you would like to exercise any of these rights, please contact the Axon Beal Ltd t/a Clark Dental Sales Privacy Office at jayne.beal@clarkdentalsales.co.uk. To assist us in responding to such requests in a timely fashion, please include the phrase "Privacy Rights Request" in the title of your message.
- 11. Data subjects may, where permitted by applicable law, request copies of their Personal Data. This is known as a subject access request or SAR.
- 12. If you would like to make a SAR, i.e. a request for copies of the Personal Data we hold about you, you may do so by writing to the Data Protection Contact whose details are provided above. The request should make clear that a SAR is being made. We may ask you to provide evidence of your identity if it is not clear.
- 13. Responding to a SAR can be a time consuming exercise. Axon Beal Ltd t/a Clark Dental Sales may be able to get the information that you require more quickly if you are as specific as possible in your request. E.g., "I would like a copy of my Personal data contained in my website member account file" or if you would like a copy of a particular document it would be helpful if the document is described carefully, including the title, creation date, author and likely place of storage. This will help us to respond to your SAR as quickly as possible. You may be asked for further details to assist us if insufficient information is provided.

#### **Public areas**

14. The Axon Beal Ltd t/a Clark Dental Sales websites may make chat rooms, careers, message boards, and/or news groups available to its users at various times. Please remember that, unless otherwise stated, any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information in these areas. Do not use these areas to post personal information about third parties or discuss information about specific, identifiable patients.

#### Links to other websites

15. Our website may contain links to other websites. Axon Beal Ltd t/a Clark Dental Sales are not responsible for the privacy practices or the content of unaffiliated third-party websites. To help ensure the protection of your privacy, we recommend that you review the privacy policy of any website you visit via a link from the website.

# Updates to our privacy statement

16. We may at any time in our sole discretion revise or update this Privacy Statement. We will indicate at the top of the Privacy Statement when it was most recently updated. All changes are effective immediately when they are posted and apply to all access to and use of the website thereafter.

# Cookies/tracking statement

17. In order to collect certain data described in this Privacy Statement, we may use cookie technology on our website.

A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of the services and features offered through our websites may not function properly if your cookies are disabled.

The following are examples of cookies that mat may be used on our websites:

a) **Strictly necessary cookies.** These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for, like saving your job application, adding products to a cart, checking out, cannot be provided.

- b) **Performance / analytic cookies.** These cookies collect data about how visitors use our websites, including the country from which the visitor is accessing from. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. All data these cookies collected is aggregated and do not seek to personally identify you.
- c) **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- 18. Our website may also use social and video plugins such as those provided by Facebook, Twitter, Instagram, LinkedIn or YouTube.

When you visit a page of our website that contains a social, video or other plugin, your browser establishes a direct connection to the server for that plugin, and provides them with the information that you have accessed the corresponding page of our website. If you are logged into that service as well, your visit can be connected to your account with that service. Therefore, if you interact with the plugins, for example by clicking "Like," or entering a comment, the corresponding information is transmitted from your browser directly to that party. Your interactions with those services are governed by their applicable privacy policy and other policies which can be located on their websites.

# Contact us:

If you have any questions, comments or requests regarding this privacy policy or our processing of your information, please contact:

Data Protection Officer

Axon Beal Ltd t/a Clark Dental Sales

Zan Business Park

Crewe Road

Sandbach, Cheshire CW11 4QD

dataprotection@clarkdentalsales.co.uk