

UK External Privacy Notice

Overview

This privacy notice provides you with details of how we collect and process your personal information through a number of channels:

- use of our websites,
www.brightwake.co.uk,
www.advancis.co.uk,
www.advancis-elearning.co.uk,
www.advancisveterinary.com,
www.advancissurgical.com,
- use of our social media links:
<https://www.facebook.com/AdvancisMedical/>
<https://www.facebook.com/AdvancisVeterinary/>
<https://www.facebook.com/advancissurgical/>
<https://www.linkedin.com/in/advancis-veterinary-886310135/>
<https://www.linkedin.com/company/advancis-medical/>
<https://www.linkedin.com/showcase/advancis-surgical/>
<https://twitter.com/advancismedical>
<https://twitter.com/advancisvet>
<https://twitter.com/Advancisurgical>
- via general communication (oral or written) including any information you may provide when you purchase a product or service, sign up to our newsletter or take part in a product survey.

Mark Smith is the Group Data Controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Corporate Details

Our full details are:

Full name of legal entity:	Brightwake Limited
Brands & Trading Styles:	Advancis Medical, Advancis Surgical, Advancis Veterinary.
Email address:	info@brightwake.co.uk info@advancis.co.uk info@advancisveterinary.com info@advancissurgical.com



Postal address: Brightwake Ltd
Sidings Road
Lowmoor Business Park
Kirkby-in-Ashfield
Nottinghamshire
NG17 7JZ

Telephone number: +44(0)1623751500,
+44(0)1623751151

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at privacy@brightwake.co.uk

What information does the organisation collect about you?

The organisation collects a range of information about you, some of which is personal data.

Personal data means any information capable of identifying an individual. It does not include data that is anonymised at source.

The types of information constituting personal data that we may collect about you is as follows:

- Specific information on your identity, which would include your first name, last name, username, title.
- Contact information, which would include your billing address, delivery address, email address and telephone numbers.
- Financial information, which would include your bank account and payment card details.
- Specific information which would include details about payments between us and other details of purchases made by you.
- Specific technical information which would include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site. Associated to the technical information would be:
 - Profile data such as your username and password, purchases or orders, your preferences, feedback and survey responses.
 - Usage data such as information about how you use our website, products and services.



- In relation to Marketing and Communications we may include information of your preferences in receiving marketing communications from us and our third parties and your communication preferences.

We may also process aggregated data from your personal information but this will not reveal your identity and as such in itself is not personal information. An example of this is where we review your usage data to work out the percentage of website users using a specific feature of our site. If we link the aggregated data with your personal information so that you can be identified from it, then it is treated as personal.

We do not collect any sensitive information about you. This refers to information that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal information by law, or under the terms of the contract between us and you do not provide us with that information when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested information, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

How we obtain personal information about you?

We collect information about you through a variety of different methods including:

- Directly via communications: This could be by the information you provided by completing forms on our website (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
 - order our products or services;
 - If ordering via our website and providing us with your personal information, you warrant to us that you are over 16 years of age.
 - subscribe to our social media links;
 - request samples or marketing literature be sent to you;
 - participate in a product survey; or
 - give us any feedback.
- Directly from Technology: As you use our websites, we may automatically collect technical data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive technical data about you if you visit other websites that use our cookies. Please see our cookie policy at <http://www.advancis.co.uk/privacy-and-cookie-policy> for further details.
- Directly from publicly available sources or third parties such as:
 - Technical information: From website analytic providers such as Google Analytics.
 - Other analytic providers such as Google who are based outside the EU



- Basic Identity and Contact information from publicly available sources such as Companies House and the Electoral Register based inside the EU.
 - Other Basic Identity and Contact information from publicly available sources which may be based outside the EU including your company website and your LinkedIn profile.

How we use your personal information?

We will only use your personal information when legally permitted. The most common uses of which are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at privacy@brightwake.co.uk.

Use of your personal information for marketing communications

You will receive marketing communications from us if you have:

- requested information from us or purchased goods or services from us; or
- if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- in each case, you have not opted out of receiving that marketing.
- You can ask us to stop sending you marketing messages at any time by emailing us at privacy@brightwake.co.uk at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Use of your personal information for other reasons

Set out below is a table of the ways we intend to use your personal information and the legal grounds on which we will process such information. Where applicable we have explained what our legitimate interests are in that information.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at privacy@brightwake.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.



Business Purpose	Information Used	Our basis for processing that information
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To enable you to partake in a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business

Business Purpose	Information Used	Our basis for processing that information
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud (b) Necessary to comply with a legal obligation
To deliver relevant website, marketing and advertisements to you and measure and understand the effectiveness of these processes	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

If we change the purpose for which personal information was collected

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at privacy@brightwake.co.uk.

If we need to use your personal information for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be obliged to process your personal information without your knowledge or consent where this is required or permitted by law.

Who has access to your personal information?

Your information will be shared within our organisation to those members of staff that need that information in the necessary performance of their roles.

We may have to share your personal information with third parties such as those listed below:

- Service providers who provide IT and system administration services.
- Professional advisers including consultants, contractors, lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

What if we transfer your personal information out of the EEA?

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Some of our third party service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.



Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Please email us at privacy@brightwake.co.uk if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

How do we protect your personal information?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Our systems are controlled regarding number of users and password protected.

Where we engage with third parties to process personal information on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organizational measures to ensure the security of the data.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How long do we retain your personal information?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.



By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

What are your legal rights?

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at privacy@brightwake.co.uk.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



Appendix I – Notes on our Websites

Third-party links

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see: <http://www.advancis.co.uk/privacy-and-cookie-policy>.

