

Privacy policy

1. Introduction

Welcome to our privacy policy. We respect your privacy and are committed to protecting your personal data. This privacy policy applies to the use of our website and services (together, the "Services") and informs you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This policy also covers our treatment of personal data provided to us by third parties, particularly our dental practice clients and such personal data of their patients which is provided to us in order for us to provide our Services to those practices. If you are a user of our Services and you provide us with any personal data about another person, you represent and warrant that you have that person's consent and/or another lawful basis to do so and for us to collect, process, use and store their personal data for the purpose for which you have sent it to us.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements any such other notices and privacy policies and is not intended to override them.

We keep our privacy policy under regular review to ensure that it is accurate and current. Please revisit this page to stay aware of any changes.

It is also important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. Who we are

Data Ravens IO Ltd is the controller and responsible for your personal data ("we", "us" or "our" in this privacy policy).

We are a limited company incorporated and registered in England & Wales with company number 15520985 and our registered office address at Unit 82a James Carter Road, Bury St. Edmunds, Suffolk, United Kingdom, IP28 7DE.

We are registered with the Information Commissioner's Office (ICO) in the United Kingdom as a data controller under registration number 00016510679.

If you have any questions about this privacy policy or our privacy practices, please contact us at info@dataravens.io.

3. The personal data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone number.
- **Usage Data** includes information about how you use our website and services.
- **Patient Data** includes information relating to patients of dental practices who are users of

our Services and which are provided to us by such dental practices in order for us to provide our Services to those practices, including patients' Identity Data, Contact Data, age, and details of their dental treatments (including treatment type and date).

- **Financial and Transaction Data** includes details about any payments to and from you and other details of any products and services you have purchased from us, including where applicable your bank account and payment card details.
- **Technical Data** includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may collect **Special Categories of Personal Data**, particularly data concerning health relating to patients of dental practices who are users of our Services and who provide such data to us in order for us to provide our Services to those practices. Such data may then be anonymised and form part of our Aggregated Data (as described below). We do not collect any information about criminal convictions and offences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate Patient Data in order to provide health trends and insights into dental practice performance for users of our Services. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Where we need to collect personal data by law, or under the terms of a contract, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

4. How do we collect personal data?

We use different methods to collect personal data, including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - subscribe to or participate in our services or publications;
 - request marketing to be sent to you; or
 - give us feedback or otherwise contact us.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Patient Data from our dental practice clients who provide us with such data in the course of using our Services.
 - Technical Data from analytics providers such as Google, advertising networks, and search information providers
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services; and
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookies policy for further details.

5. How we use personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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 obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that 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 contact us 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.

Purpose/activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user	(a) Identity (b) Contact	Performance of a contract
To carry out our obligations arising from any contracts entered into between us and our dental practice clients, including the provision of our Services to such practices	(a) Patient	(a) Performance of a contract (b) Necessary for our legitimate interests (for running our business and providing the Services to our clients)
To administer and protect our business and this 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 and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform

the advertising we serve to you	(d) Usage (e) Marketing and Communications (f) Technical (g) Financial and Transaction	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 website 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 (f) Marketing and Communications (g) Financial and Transaction	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or other transactions.

Change of purpose

We will only use your personal data 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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of your personal data

In certain circumstances we may share your personal data with the parties listed below for the purposes set out in the table above.

Where we share personal data with any such third parties, we require all third parties to respect the security of your personal data and to treat it in accordance with the law. In particular, we do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

- Third-party vendors, service providers, consultants, contractors or agents who perform services for us or on our behalf and require access to such information to do that work, such as:
 - IT maintenance and service providers, providers of software applications through which our IT systems and document management activities are carried out, as well as the hosting of these software applications;
 - data analysis, data statistics, surveys/feedback, and customer service providers; and
 - service providers for our administrative/secretarial services, internal organisational flows, such as our digital productivity, collaboration, and organisational app, video-conferencing solutions and calendar application services.
- Professional advisers such as our lawyers, bankers, auditors and insurers who provide us with consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other public authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

7. International transfers

Some of our staff and external third parties may be based outside, or have part of their operations outside, the UK and so their processing of your personal data will involve a transfer of data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following conditions applies:

- that the country in question has been deemed to provide an adequate level of protection for your personal data; and/or
- that appropriate measures are in place in our contractual arrangements with third parties to ensure an adequate level of protection for your personal data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

8. Data security

We have put in place appropriate data privacy and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have also 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.

9. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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

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

In some circumstances we will 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.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, namely:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at info@dataravens.io.

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 could 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 could 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.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

11. Third-party links

This website 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 policy of every website you visit.

12. Cookies

Our website may use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Cookies are small pieces of information, usually consisting of just a small file of letters and numbers, which are downloaded to your computer or mobile device when you visit a website and allow the website to recognise your device. Cookies are used for many purposes, including letting you navigate between webpages efficiently, remembering your preferences and generally improving the user experience.

In addition, cookies can help website operators analyse the use of their websites and online content (analytical cookies) and can also facilitate and track the interaction on a website and online content with social media (e.g. links to social media sites, like buttons, etc.). They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

In common with most websites and website operators, we use certain cookies to capture information about the users of our website and we use the information collected from our cookies for the purposes described below:

- **Strictly necessary cookies:** These are cookies that are required for the core operation of our website or to provide certain features. Our website cannot function properly without these cookies.

- **Analytical or performance cookies:** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies:** These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences.

You can adjust your cookie settings and block cookies by activating the option on your browser that allows you to refuse the setting of all or some cookies. If you want to remove existing cookies from your device, you can also do this using your browser options.

Advice on cookies generally, including blocking or removing cookies on a variety of popular browsers, can be found online via a simple web search. Alternatively, consult the 'help' section of your browser.

Please note that if you use your browser settings to block all cookies (including essential cookies) you may not be able to access certain parts of or certain content on our website.

If you have any questions about the cookies in use on our website, please contact us using the contact details on our website.