

Privacy Policy

Your privacy is important to us, and we are committed to dealing with your personal information responsibly and in accordance with General Data Protection Regulation (EU GDPR and UK GDPR).

This Privacy Policy sets out how BlueWorks collects, uses, stores, and discloses personal information

1.1. Who are we:

We are BlueWorks OIMS UK Limited, registered in England & Wales with Company Number 11397440, and offices at Whitfield Business Hub, 184-200 Pensby Road, Heswall, Wirral, Merseyside, CH60 7RJ United Kingdom.

Our registration number with the Information Commissioner's Office is ZB074286.

If you have any questions regarding this Privacy Notice or how we process your personal data please contact us using the details below:

- dataprotection@blueworks.uk

If you believe that we have failed to resolve the complaint or you still have a concern, you can contact ICO in any of the following ways:

- Mail: Information Commissioner's Office; Wycliffe House; Water Lane; Wilmslow; Cheshire; SK9 5AF
- Helpline number: 0303 123 1113
- ICO website: <https://www.ico.org.uk>

1.2. General information

1.2.1. What constitutes data processing?

Processing covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

1.2.2. What are 'controllers' and 'processors'?

Controllers are the main decision-makers – they exercise overall control over the purposes and means of the processing of personal data.

If two or more controllers jointly determine the purposes and means of the processing of the same personal data, they are joint controllers. However, they are not joint controllers if they are processing the same data for different purposes.

Processors act on behalf of, and only on the instructions of, the relevant controller.



1.3. What personal data we control or process about you?

We will control or process distinct types of data, for distinct types of users.

We may collect or have access to personal information for purposes which are directly related to our services and activities, and only when it is necessary.

We are both a data controller and processor for:

- Data from our employees
- Visitors to our website
- Professionals contacting us with business or support enquiries

We are solely a data processor for:

- Users of our system employed by our customers
- People being cared by our customers

This is summarized on the table below:

Actor	Type of data	Role	Reason	Example
Employee	Name, address, bank details, etc..	Controller, processor	Legal obligation	contract, insurance, payroll, etc.
Website visitor	Solely IP	Controller, processor	legitimate interest	regular logs
People contacting us with business enquiries	Name, professional email, job title, professional address, professional phone number	Controller, processor	legitimate interest	reply to emails
Users of our system	Name, professional email, job title, professional address	Controller, processor	Contract	training, support
Patients of our customers	Name, numeric identifiers, date of birth	processor	contract, vital interest	providing remote support to ensure data integrity, incorrect data on patient record may create risk to patient

1.3.1. How do we process personal information

Where we are a data controller:

We may collect personal data directly from you (e.g. when you email us) or from a licensee of our software (if they send us your details so we may grant you with access/support/training). If you are a patient of one of our customers, we do not collect any data about you.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax law, accounting requirements or other legal or regulatory requirements).

When we have no ongoing business purpose to justify storing your personal information, we will either delete or anonymise it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

We collect, hold, use and disclose personal information for the primary purpose for which it was collected and for other purposes including, but not limited to:

- enable you to access and use certain of our products and services,
- contact and **communicate** with you,
- comply with **contractual** and/or **legal obligations**,

We may disclose your personal information to:

- Our employees,
- Specific third parties authorised by you to receive information held by us;
- Other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

We will only transfer your personal data to a third party if that third party agrees to comply with our procedures and policies or if they have put in place equivalent policies and procedures of their own.

Where we are a data processor, we will process your data within the scope of what requested/contracted with us by the entity controlling your data.

We may disclose your personal information to:

- Government agencies, regulatory bodies and law enforcement agencies, if required by law.

We implement a data minimization policy, where we hold or access the minimal amount of personal data required to fulfil our obligations.

1.3.2. Security

We implement appropriate technical and organisational measures to protect your Personal Information against accidental or unlawful destruction, loss, change, damage or disclosure.

We will ensure your personal data is only accessible by those who need to see it for their specific role.

1.3.3. Transferring your data outside the European Economic Area (EEA)

We will not transfer your personal data outside the EEA unless such transfer is compliant with data protection legislation.



This means that we cannot transfer any of your personal data outside the EEA unless:

- The EU Commission has decided that another country or international organisation ensures an adequate level of protection for your personal data;
- The transfer of your personal data is subject to appropriate safeguards, which may include binding corporate rules or standard data protection clauses adopted by the EU Commission; or
- An exception applies (including if you explicitly consent to the proposed transfer).

1.3.4. De-identification

We may use anonymized data for internal purposes, such as improving the functionalities of our products, in a way that does not directly identify you. When this related to data we process on behalf of a controller, data anonymization is revised and validated by the controller before any transfer of anonymous data occurs.

1.3.5. Automated decision-making

We do not perform any type of automated decision making in connection with your personal data that we control or process.

1.4. Your data protection rights

Under data protection law, you have rights including:

- **Right of access**, you have the right to ask us for copies of your personal information,
- **Rectification**, you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- **Erasure**, you have the right to ask us to erase your personal information in certain circumstances,
- **Restriction of processing**, you have the right to ask us to restrict the processing of your personal information in certain circumstances,
- **Object to processing**, you have the right to object to the processing of your personal information in certain circumstances,
- **Data portability**, you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances,
- **withdraw consent** to the processing of your personal data (where the legal reason for the processing of your personal data was your consent).
- **request the transfer** of your personal data to another data controller;

You are not required to pay any charge for exercising your rights. If you make a request, we will use our best endeavours to respond to you within 30 days of receiving it.

Please contact us if you wish to make a request (see **Our contact details** section above).

1.4.1. How to complain

If you have any concerns about our use of your personal information, or you wish to make a complain about the way we have handled your personal information, you can contact us (see **Our contact details** section above).



If you think that we have failed to resolve the complaint or you still have a concern, you can contact ICO in any of the following ways:

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