

INTRODUCTION

This policy sets out the basis for which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We keep certain basic information when you visit our website and recognise the importance of keeping that information secure and letting you know what we will do with it.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Brain in Hand Ltd of Curzon House, Southernhay West, Exeter, Devon. EX1 1RS (registration number 06971006). This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the policy of that website provider. We have no control over that policy or the terms of the website and you should check their policy before continuing to access the site.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site www.braininhand.co.uk (our site). This includes information provided at the time of registering to use our site, subscribing to our service or requesting further services. We may also ask you for information when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our site include, but not limited to, traffic data, location data, weblogs, operating system, browser usage and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

IP ADDRESSES AND COOKIES

We may collect information about your computer, including where available your Internet Provider (IP) address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about your browsing actions and patterns and does not identify you, and we will not collect personal information in this way.

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log in to our site.

WHERE WE STORE YOUR PERSONAL DATA

The data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service when you choose to do so.
- To notify you about changes to our service.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to third parties:

- In the event we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data to comply with any legal obligation, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

RETENTION OF YOUR INFORMATION

Personal information provided to process a Brain in Hand application is retained for seven years from last contact. It is stored within our internal secure system, Sharepoint, which is only accessible by authorised members of staff.

Personal information on the BIH secure system includes your name, email address and mobile phone number. Within your personal BIH website, the Profile page will include your address, emergency contact details and notes for traffic light response. Other pages contain information for your use of BIH. The BIH secure system is only accessible by authorised members of BIH staff and client system administrators where relevant.

When your licence is closed, your account is deactivated for the duration of the subscription period, to allow you to reinstate your account intact during that time. If your licence is not renewed, your website and account are deleted, no information would be retained.

Reference Software licences with the Records Management Code of Practice for Health and Social Care 2016 <https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016>. Whilst client system administrators can deactivate user accounts, only authorised members of BIH staff can delete a user account.

INFORMATION GOVERNANCE & DATA PROTECTION FOR BRAIN IN HAND USERS

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise the right at any time by contacting us at admin@braininhand.co.uk.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

INFORMATION GOVERNANCE & DATA PROTECTION FOR BRAIN IN HAND USERS

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on our site.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to admin@braininhand.co.uk.