

Privacy Policy

Shore-Up CIC ("we", "us", "our") are committed to protecting and respecting your privacy.

The purpose of this policy

This privacy policy relates to your use of our website only. This privacy policy (together with our [website terms of use](#), [cookies policy](#) and any other documents referred to on it) sets out the basis on 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.

The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation ("GDPR").

Important information and who we are

By visiting www.shore-up.co.uk (the "site") you are accepting and consenting to the practices described in this policy except where your explicit consent is needed to allow us to process your personal data for certain purposes (e.g. to contact you with marketing information), in which case we shall ask you for this consent separately.

For the purpose of the Data Protection Act 2018 (the "Act"), the data controller is Shore-Up CIC of 5 Edmonton Place company number (Company No. 13474636). You can contact us by post at the above address or at contact@shore-up.co.uk or by telephone on 07966964316.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

Changes to this policy and your duty to inform us of changes

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy. This policy was last updated on 16 July 2023.

We want our service to meet your expectations whenever you deal with us. To do this, it is important that the information we hold about you is accurate and up to date. So, do please tell us promptly of any changes to your personal information or circumstances during your relationship with us.

Third party links

The site may from time to time include links to and from 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 Site, we encourage you to read the privacy notice of every website you visit.

Information we collect about you

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 the following types of personal data about you:

- **Identity Data** includes your first name, any maiden name, last name, username or similar identifier, marital status, title, date of birth, occupation and gender.
- **Contact Data** includes your address, email address and telephone numbers.
- **Financial Data** includes bank account details, financial information about you and/or your business.
- **Services Data** includes details about any enquiries you make about our services, any payments to and from you, other details of services we have provided to you, your business details, and details of any matter that you enquire about and/or we provide services in respect of.
- **Technical Data** includes the browser type and version you use to access the Site, time zone setting, and operating system and platform, information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose (“**Aggregated Data**”). Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website page or feature. 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.

We may collect Special Categories of Personal Data about you via the Site. Special Category personal data is personal data which is identified by the UK GDPR (and EU GDPR) as being more sensitive and therefore needing more protection. This includes (but is not limited to) 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.

The specific types of Special Category personal data we may collect from you are:

- a) [NEED TO INSERT THE TYPES OF SENSITIVE INFORMATION YOU MAY COLLECT]
- b) Eg. Medical records
- c) Eg. Sexual activity
- d) Eg. Religious beliefs
- e) Eg. Philosophical beliefs
- f) [XXX]

We will use such data for the reasons and on the lawful bases outlined in the table below as relevant.

We are required by law to meet a further condition to have the right to use certain special categories of personal data. In the event that we wish to collect any Special Categories of Personal Data we will notify the relevant individual and gain their express written advance consent.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you to provide you with services 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. In this case, we may have to cancel a services contract you have with us but we will notify you if this is the case at the time.

How your personal data is collected

We use different methods to collect data from and about you including through:

- **Direct interactions** You may give us your Identity, Contact, Financial and Services Data by filling in different parts of our Site or by corresponding with us by phone, e-mail or otherwise. If you make an enquiry via the Site, we will also collect the information you insert in to our enquiry form.
- **Automated technologies or interactions** As you interact with our Site, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our Cookie Policy for further details.
- **Third parties or publicly available sources** We may receive personal data about you from various third parties and other sources or if you use any other services we provide (such as social media platforms). We are working closely with third parties including, for example, Technical and Usage Data from the following parties:
 - analytics providers such as Google Analytics. This information is anonymised into analytics for the Site; and
 - search information providers.

How we will use your information

We will only use your personal data when the law allows us to and only to the extent that is necessary for the purpose. Most commonly, we will use your personal data in the following circumstances:

- where you have given consent

Commented [EB1]: Kate. You need an additional justification for holding / using 'special' data ie sensitive info (ie info that goes beyond simply identifying the individual). The best option is to say you will gain their consent for this specific type of info. I've drafted it as such. Let me know if this isn't practical.

- Where we need to perform a contract with you or to take steps at your request before entering into a contract
- 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 (for example, to ensure that content from the Site is presented in the most effective manner for you and for your computer).
- Where we need to comply with a legal or regulatory obligation.

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
To respond by way of automated email reply, if you submit an enquiry via the Site	a) Identity b) Contact	a) Performance of a contract, or because you have asked us to take specific steps before entering into a contract b) Necessary for our legitimate interests (to provide a good service in acknowledging your enquiry)
To register you as a new or prospective client	a) Identity b) Contact c) Services d) financial	Performance of a contract with you
To provide you with the occupational therapy services you have requested including: <ul style="list-style-type: none"> • Enquiring about your lifestyle, relationships, health status and work • Managing payments, fees and charges 	a) Identity b) Contact c) Financial d) Services e) Marketing and Communications	a) Performance of a contract with you b) Necessary for our legitimate interests (to provide you with the best possible service and to recover payments due to us)

<ul style="list-style-type: none"> • Collecting and recovering money owed to us 		
<p>To manage our relationship with you which may include:</p> <ul style="list-style-type: none"> • Enquiring about your lifestyle, relationships, health status and work • Notifying you about changes to our services, terms or privacy policy <ul style="list-style-type: none"> • Asking you to give us feedback or leave a review • Payment 	<ul style="list-style-type: none"> a) Identity b) Contact c) Financial d) Services e) Marketing and Communications 	<ul style="list-style-type: none"> 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 clients use and value our services)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, research, statistical and survey purposes, reporting and hosting of data)</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Marketing and Communications 	<p>Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow Shore-Up and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website (to ensure that content is presented in the most effective manner for you and for your computer), our services, marketing, client relationships and experiences</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Marketing and Communications 	<p>Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about services that may be of interest to you</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage 	<p>Necessary for our legitimate interests (to develop our products/services and grow Shore-Up)</p>

	e) Marketing and Communications	
To provide professional support and advice in an occupational therapy role	a) [list the types of special category of personal data eg medical history]	a) Necessary for our legitimate interests (to develop our products/services and grow Shore-Up) b) Performance of a contract with you

We may combine information we receive about you from other sources with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

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.

Marketing

We will not use your personal data for direct marketing purposes but where you have given your consent we may contact you to inform you of upcoming events that we think you may be interested in. Should you change your mind at any time and no longer wish to receive such updates from us, please contact us.

Email addresses

We respect the privacy of personal email accounts and we store your email addresses just as securely as other personal information. We will not send you unwanted email messages or junk mail, and your details will not be passed to any other organisation for marketing purposes without your explicit permission.

When we will disclose your information to others

We may have to share your personal data with third parties as set out below for the purposes set out in the table above.

- **External service providers:** We sometimes use other companies or businesses to provide some of our services or to provide services to us (for example, accountants, IT and system administration services). To enable them to do this, we may need to let them process your personal information.

Our staff and those working for us as agents or contractors have a responsibility to keep your information confidential and are only allowed to use it to offer services on our behalf.

- **Selected third parties** including:
 - website, analytics and search engine providers that assist us in the improvement and optimisation of the Site;
 - professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services either to us or on our behalf in respect of the services we are providing to you;
 - search information services.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets (in which case personal data held by us about our clients will be one of the transferred 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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

We will also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions for use of the website and other agreements; or to protect the rights, property, or safety of Shore-Up CIC, our clients, or others.

Except as set out above, we will not disclose to third parties any and all information collected by us. Projects worked on by us will be kept strictly confidential and will not be sold, reused, loaned, or otherwise disclosed to any third party.

Where we store your personal information

All information we collect from you is stored on secure servers. We do not transfer your personal data outside the European Economic Area (EEA).

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

How long we store your personal information for

We keep your information only for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, reporting or regulatory requirements.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Services Data) for a certain amount of time after they cease being a client of ours for tax, regulatory and/or Health and Care professions Council purposes.

In some circumstances you can ask us to delete your data. Please 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.

How we protect your information

We take all reasonable care to prevent any unauthorised access to your personal data.

We have put in place appropriate 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 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.

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 the 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.

Cookies

Our website uses 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 the Site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookies Policy](#).

Your rights

In 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 (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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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.

No fee usually required

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.

What we may need from you

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.

Time limit to respond

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.

Contact us

If you have any questions about this Privacy Policy that are not answered above, or would like further information on how your information is used and how we maintain the security of your information, please email us at please_email_contact@shore-up.co.uk or telephone us on 07966964316. Alternatively, you can submit an enquiry via the website.

