

PRIVACY POLICY

1. INTRODUCTION

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or the UK Information Commissioner's Office (ICO) in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the UK) and we are responsible as 'controller' of that personal information for the purposes of those laws.

2. ABOUT US

When we say "we" or "us" in this privacy policy, we mean Watford Orthodontics. You can contact us at:

Address: JL Dental Care

92 Edgware Way, Edgware, Middlesex, HA8 8JS.

t. 020 8958 0136

e. info@jldentalcare.co.uk

3. PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect and use the following personal information about you:

- your full name
- your email and phone number
- your postcode
- information about your appointment with us, including what orthodontic services you have requested
- limited information about your health (such as previous orthodontic work) in connection with your appointment
- information about how you use our website
- information about the device and programmes you are using to use our website such as your browser and operating system

This personal information is required to provide services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

4. HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect personal information directly from you, whether via our website or when contacting you about your appointment.

We may also collect personal information from cookies on our website (more information is set out in section 10 below) and from our IT systems (such as appointment logs, automated monitoring of our websites, instant messaging systems) and CCTV.

5. HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- for the performance of our contract with you or to take steps at your request before entering into a contract (such as arranging your first appointment);
- to comply with our legal and/or regulatory obligations;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

If you are interested in booking an appointment with us, we will need to collect personal information from you in order to take steps necessary to process your appointment and to provide you with the services you have requested from us.

The technical information gathered from the use of our website (including through our use of cookies) which may include personal data, is used for our legitimate interest of ensuring that our website is functioning properly and to help us make business decisions about the information to be provided on our website.

6. MARKETING COMMUNICATIONS

We may use your personal information to send you updates by email, text message, telephone or post about our services, events, news and promotions.

We may send marketing communications to you as an existing customer about similar products we think you may be interested in, however we will always give you the opportunity to opt-out or unsubscribe from these communications if you wish.

We will always treat your personal information with the utmost respect and never share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by using the "unsubscribe" link in emails or contacting us at the details above.

We may ask you to confirm or update your marketing preferences in the future, or if there are changes in the law, regulation, or the structure of our business.

7. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share personal information with:

- third parties we use to help deliver our services, e.g. IT and digital service providers, such as our supplier who hosts this website and data collected from it on our behalf and helps us co-ordinate and send marketing communications;
- our professional services advisers (such as lawyers, accountants and auditors)
- Google Analytics: we work with Google Analytics to automatically collect information including: IP address; MAC (Media Access Control) address; unique identifier or other persistent or non-persistent device identifier; device software platform and firmware, mobile phone carrier and geo location data to help us understand your use of our website such as how often you return, what parts of the website you visit, how you use the website and how long you spend on the website. This third party provider is prohibited from using your data for any other purposes. Go to <http://www.google.com/analytics/terms/us.html> to read the Google Analytics Privacy Policy.
- Software of Excellence/Mailchimp: this is the system we use to send email notifications from our website, which is needed to ensure that email notifications get to delivered to their intended destination and minimize the chance of them being blocked by spam filters. This includes sending you email confirmations where required or requested; for example, if you have requested to download a guide, we will then send you an email containing the guide, or a link to view the guide. SendGrid does not store the content of the emails, but information such as your email address, and time the email was sent, which is required for it perform its functions.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

8. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf
- to show that we treated you fairly
- as required by law.

We will not retain personal information for longer than necessary for the purposes set out in this policy. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Please note that different retention periods apply to different types of personal information held. Further details on this are available on request.

9. TRANSFERRING YOUR PERSONAL INFORMATION OUT OF THE EEA

It is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g. with our service providers located outside of the EEA.

These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries do not have the same data protection laws as the UK and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to ensure that any US-based suppliers are certified under the EU-US Privacy Shield scheme, or alternatively to use standard data protection contract clauses that have been approved by the European Commission.

If you would like further information on international transfers of data, this is available on request.

10. COOKIES

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. We use cookies on our website to:

- recognise you whenever you visit our website (this speeds up your access to the website as you do not have to log in each time);
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve our content; and
- make your online experience more efficient and enjoyable.

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookie is essential in order for us to provide you with a service you have requested.

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

The table below provides some information on the cookies which we use on our website:

Cookie name	What it does	Why is it used	How long it lasts
CONCRETE5	This cookie is a session cookie. This means that each time you visit our website it is created and when you leave our website it is removed. It enables our web server to respond to your actions on the site when viewing pages and blogs.	concrete5 is an open source content management system (CMS) for publishing content on the World Wide Web and intranets.	This cookie will expire when you close the website tab, No personal information is stored in these

			cookies.
CONCRETE5_INSTALL_TEST	<p>This cookie is a session cookie. This means that each time you visit our website it is created and when you leave our website it is removed. It enables our web server to respond to your actions on the site when viewing pages and blogs.</p>	concrete5 is an open source content management system (CMS) for publishing content on the World Wide Web and intranets.	This cookie will expire when you close the website tab, No personal information is stored in these cookies.
__utma, __utmb, __utmc, __utmz, _ga, LSID, LSID, LSOSID, GALX, GoogleAccountLocale_session	<p>Google Analytics: A random unique number or string of letters and numbers to identify your browser, the times and dates that you interacted with the site</p>	<p>Google Analytics is a web analytics service provided by Google, Inc. ("Google"), to help us see how our website is used. In doing so information about your use of our website, including your IP address,</p>	<p>The longest lasting cookie expires 2 years after your last visit to the website. Others are</p>

	<p>recently and the marketing materials or referring pages that led you to the site.</p>	<p>may be transmitted to Google and stored on servers in the United States. The data collected by Google Analytics is used to analyse how frequently the same people revisit the University website, how the website is found (from advertising or referring websites), and which pages are most frequently viewed. This information is combined with data from thousands of other users to create an overall picture of website use, and is never identified individually or personally and is not linked to any other information we store about you.</p>	<p>deleted 6 months, 30 minutes and the moment you close your browser.</p>
<p>landing</p>	<p>Bugherd: BugHerd</p>	<p>bugherd is a bug tracker</p>	<p>these cookie</p>

	<p>uses a 3rd party cookie to remember your login so that the sidebar will show on your site for all the invited users. It's possible that cookies have been deleted, or that you are using a different browser or different computer from when you last logged into BugHerd.</p>	<p>for web designers and developers. it embeds in the website you're building and allows technical and nontechnical people to collaborate on the website as it's being built.</p>	<p>s will generally be sessional cookies, and are not retained on your system once you close your browser.</p>
<p>LOGIN_INFO, demographics, VISITOR_INFO1_LIVE</p>	<p>Youtube: Various unique identifiers, as well as login information that may relate to a Google account.</p>	<p>Google set a number of cookies on any page that includes a Youtube video. While we have no control over the cookies set by Google, they appear to include a mixture of pieces of information to measure the</p>	<p>Most of the cookies expire 10 years after your last visit to a page containing a Youtube video,</p>

		<p>number and behaviour of Youtube users, including information that links your visits to our website with your Google account if you are signed in to one. Information about your use of our website, including your IP address, may be transmitted to Google and stored on servers in the United States. This cookie does not identify you personally unless you are logged into Google, in which case it is linked to your Google account.</p>	<p>although some expire sooner.</p>
<p>GAPS, NID, PREF, SNID, GoogleAccountsLocale_session</p>	<p>Google Calendar: Various unique identifiers, except for PREF</p>	<p>Google set a number of cookies on any page that includes a Google Calendar. While we have no control over the cookies</p>	<p>The longest lasting cookie expires 2 years after your last</p>

	<p>which stores your options such as preferred zoom level.</p>	<p>set by Google, they appear to include a mixture of pieces of information to measure the number and behaviour of Google Calendar users, as well as information about which calendar you are viewing, and which tab you are currently on.</p>	<p>visit to the website.</p>
<p>khcookie, APISID, S_awfe, SSID, SS, SID, SAPISID, PREF</p>	<p>Google Map: Various unique identifiers, except for PREF which stores your options such as preferred zoom level.</p>	<p>Google set a number of cookies on any page that includes a Google Map. While we have no control over the cookies set by Google, they appear to include a mixture of pieces of information to measure the number and behaviour of Google Maps users.</p>	<p>Most of the cookies expire 10 years after your last visit to a page containing a Google Map. Except for SS which will expire after 10 years.</p>

<p>HSID, NID, PREF, SAPISID, SID, SSID, S, S_adsense, BEAT, ULS, OTZ</p>	<p>Google Plus: Google plus cookies which allow sharing of a page on Google plus account.</p>	<p>Google+ is a social networking and identity service owned and operated by Google Inc.</p>	<p>The longest lasting cookie expires 2 years after your last visit to the website.</p>
<p>act, c_user, csm, dart, fr, lu, p, pl, presence, s, sub, xs, datr</p>	<p>Facebook: Facebook cookies which allow sharing of a page on Facebook.</p>	<p>Facebook is an online social networking service.</p>	<p>The longest lasting cookie expires 2 years after your last visit to the website.</p>
<p>__adroll, __consent</p>	<p>The AdRoll platform uses cookies, tracking pixels and related technologies to provide our services for Advertisers. Cookies are small</p>	<p>AdRoll is an online marketing platform that now has a handful of products including what they're known best for remarketing/retargeting.</p>	<p>The longest lasting cookie expires 2 years after your last visit to the website.</p>

	data files that are served by our platform and stored on your device.		
SnapABugRef, SnapABugHistory, SnapABugVisit, SnapABugNoProactiveChat, SnapABugChatSession, SnapABugChatPoll, SnapABugChatMessage, SnapABugChatView, SnapABugUserEmail, SnapABugBanned, SnapABugChatWindow, SnapABugMinimizeStashCookie, SnapABugAgentAvatar	Tracking of origin and site entry, tracking of chat in progress, tracking of chat in progress, message type by visitor persistence across pages, check logic handling, keep track of the visitor visits and last chats to present history to agent, detection of new session, visitor email address used to prepopulate the pre-chat window, tracking of	SnapEngage is a live chat software that is designed to empower your sales and support teams with features like team chats, reporting, monitoring, user roles, transfers, and priority tiers.	Minimum duration of the cookies are 0 mins and maximum is 1 year.

visitor banned for chatting (banned by agent ban command), tracking of the chat box position and minimize status, detection of new messages while minimized so they persist during navigation , we are using this cookie to store the agent image URL for showing the agent avatar on the minimize state of the chat.

The only personal information about the visitor stored in a cookie is the email address they

	provided. This information is scrambled (not readable in plain text)		
_clientIdTracked	Used to track last visited pages, source i.e. from where user landed, medium if any, content if any, keywords/terms that user entered in search engine to find us, campaign tracking i.e. if user is visiting from on going campaign, client id is generated as random numbers to identity user as unique.	Growdental/TIO has developed it to for tracking user activity at site and provide them better experience and quality.	

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of our website.

For further information about cookies and how to disable them please go to the ICO's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.

11. YOUR PRIVACY RIGHTS

Data protection laws give you a number of rights as set out below. If you would like to exercise any of your rights, please contact us in writing.

- Access: you may request access to a copy of your personal information.
- Withdraw Consent: where our processing of your personal information is based on your consent, you can withdraw your consent at any time.
- Rectification: you may ask us to rectify any inaccurate information we hold about you.
- Erasure: you may ask us to delete the personal information we hold about you, where there is no reason for us to continue to hold your information.
- Portability: you may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable format, or you can ask us to send your information in this format to another controller.
- Object: you may object to our processing of your personal information.
- Restriction: you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

If you are not happy with the way in which we process your personal information, or the way in which we handle any request by you to exercise your privacy rights, you may make a complaint to the ICO by visiting their website at <https://ico.org.uk/concerns/> or on 0303 123 1113.

12. KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

13. CHANGES TO THIS PRIVACY POLICY

This privacy policy was last updated on 25/10.2020.

We may change this privacy policy from time to time—when we do we will inform you via an announcement on our website.