Privacy Notice

1 Introduction

This privacy notice ("**Privacy Notice**") explains how ADT-Healthcare Ltd processes personal data in connection with the use of this website (our "**Website**") and the provision of our products and services, including those that we make available or promote via our Website (our "**Products and Services**").

ADT-Healthcare Ltd (referred to as "we", "us" or "our" in this Privacy Notice) is the controller of personal data for the activities described in this Privacy Notice.

Our full details and contact information are:

- Full name: ADT-Healthcare Ltd (trading as The Right Step Recovery)
- Website: www.right-step-recovery.co.uk
- Email address: enquiries[at]adt-healthcare.co.uk
- Registered Office: 20-22 Wenlock Road, London, England, N1 7GU
- ICO Number: ZA359654

2 What data we process

We may process the following categories of personal data:

- **Enquiry Data:** the contents of any communication with you (for example, when you contact us about an addiction that you suffer from) or about which you are the subject (for example when we are contacted by someone on your behalf about an addiction that you suffer from), whether that be through the contact form or live chat on our Website, telephone, email, text, or any other type of communication. Enquiry Data will include name, contact information and data relating to addiction or other healthcare issues (such as information about substance misuse, physical or mental health conditions, prescription medications, and previous treatment programmes) – this health information is known as 'special category' data.
- **Customer Data:** data relating to transactions when we provide our Products and Services, such name, title, billing address, delivery address, email address, phone number, contact details, purchase details and payment details.
- **Usage Data:** data observed or collected in relation to browsing activity on our Website. This may include information about pageviews and events on our Website; length of visit to pages on our Website; details about the number of times a user uses our Website; navigation paths and information about the webpage or other source that users were previously on before reaching our Website; and information about when a browsing session started and ended.
- **Technical Data:** data that is passed in network communications when using our Website, such as your IP address; details about your browser, device type and operating system; details of the part of our Website that you are viewing, such as full web page URL; time zone settings; location data (which may be approximate, like the city or region you are in, or more precise) of a device derived from IP address, GPS signals or information about a device's connection with local Wi-Fi equipment; diagnostic data (including crash logs, launch time, hang rate and energy use, and any other data collected for technical diagnostics purposes), and any relevant unique identifiers assigned to a device or browser (including cookie or other similar identifiers); and any other information made available by the technology on the devices you use to access our Website.

- **Marketing and Service Communication Data:** contact details, such as email address, telephone number and postal address; and data about marketing and service communication preferences.

3 How we collect your personal data

Most of the data that we collect is provided directly to us, for example when you or someone else on your behalf contacts us via our Website or by email or telephone.

We may also automatically collect certain data through our Website using cookies and similar technologies. Please see our cookie policy for more details about this.

We may receive data from third parties such as analytics providers and providers of technical, payment and delivery services.

We may also receive data from publicly available sources such as Companies House, your website and the Electoral Register based inside the EU.

4 Our processing activities – purposes and lawful basis

In summary, we process personal data:

- To provide our Website, including to carry out Website insight, analytics, and improvement. It is in our legitimate interest to use your personal data for these purposes, although where required we may rely on your consent; and
- To provide our Products and Services, including to discuss addiction or other health-related issues and care needs concerning you (or any other individual you are contacting us about), which we use to provide or recommend treatment options. With your permission, we will share personal data with third party rehab clinics that provide treatment.

Full information about the purposes for which we process personal data, and the lawful basis we rely on (as well as the condition where we process special category data), are set out in the table below:

(i) Providing our Website and related online activities

Purpose and Personal Data Processed	**Description**	**Lawful Basis / Condition**
Delivery of our Website *Technical Data*	To provide our Website to you, including ensuring that we are showing you the correct notices and information.	Legitimate interests – to provide our Website
Support, maintenance and security *Technical Data* *Enquiry Data*	To administer and protect our Website (including troubleshooting, fixing errors, analysis, testing, system maintenance, support, and security, including for fraud monitoring and prevention). To respond to user enquiries/offer support to users about use of our Website. We may use your information to respond to your enquiries and solve any potential issues you might have with the	Legitimate interests – to run our business and to protect us and our users from harm. Compliance with a legal obligation.

Purpose and Personal Data Processed	Description	Lawful Basis / Condition
	use of our Website.	
Website development and improvement *Usage Data* *Technical Data*	To develop and improve our Website, including content that we make available, through insight and analysis that we carry out in relation to the use of our Website as described in the Insight and analysis section below.	Legitimate interests – to improve and enhance our Website
Website insight and analysis *Technical Data* *Usage Data*	To carry out insight and analytics, in relation to our Website, including counting user visits and generating insights about browsing habits so that we can understand what content and features of our Website are most popular.	Legitimate interests – to learn more about use of our Website and to support the improvement of our Website

(ii) Providing our Products and Services

Purpose and Personal Data Processed	Description	Lawful Basis / Condition
Receiving and handling Enquiries about our Products and Services *Enquiry Data*	To receive and deal with any enquiry that you make (or that has been made by someone on your behalf) and to provide suitable treatment options, including those that are offered by third party private rehab clinics and those offered by the NHS.	Consent – when you contact us about yourself, we rely on your consent, including your explicit consent to process special category data. Legitimate interest – when someone else has contacted us on your behalf it is in our and your legitimate interests to process your personal data, and there is a substantial public interest in our processing of special category data.
To refer enquiries to third party private rehab clinics *Enquiry Data*	Where we determine that treatment options offered by third party rehab clinics are suitable for you, with your permission (or the permission of someone else who has contacted us on your behalf) we will share your personal data with up to three third party rehab clinics that are in our referral network.	Consent – when you have authorised us to share information about yourself, we rely on your consent, including your explicit consent to share information that is special category data. Legitimate interest – when someone else has authorised us to share information they have provided on your behalf, it

Purpose and Personal Data Processed	Description	Lawful Basis / Condition
		is in our and your legitimate interests to share your personal data, and there is a substantial public interest in doing so where that information is special category data.
Supply of our Products and Services *Customer Data* *Marketing and Service Communication Data*	To register you as a customer. To process and deliver your order for our Products and Services, including to manage and collect any fees or charges from you (or your organisation). To maintain our customer databases. To keep a record of transactions for our Products and Services.	Performance of a contract. Legitimate interests – to provide the Products and Services in an effective, safe and efficient way, and to exercise our rights in relation to transactions, including to receive payment of monies owed to us. Compliance with a legal obligation.

(iii) Customer Services, Feedback and Relationship Management

Purpose and Personal Data Processed	Description	Lawful Basis
Customer services and general enquiries *Enquiry Data* *Customer Data* *Marketing and Service Communication Data*	To manage and respond to any general enquiry (other than an enquiry about potential treatment options) that you submit to us.	Legitimate interests – to help with your enquiry, provide a good standard of service and improve our customer services.
Survey and feedback *Customer Data* *Marketing and Service Communication Data*	To help us to monitor and improve our Website and Products and Services, to assist with the selection of future product and service lines, and to train our personnel, we may carry out surveys or ask you for feedback.	Legitimate interests – to improve our Website and our Products and Services and provide them in an effective way.

Purpose and Personal Data Processed	Description	Lawful Basis
Managing our relationship with you or the organisation you work for *Marketing and Service Communication Data*	To manage our relationship with you or the organisation you work for (where your organisation is a supplier to, us) and to contact our suppliers about goods or services that we have purchased or may purchase from them.	Legitimate interests – to effectively manage our supply chains.
Public Relations and Media *Marketing and Service Communication Data*	To respond to media enquiries and requests (including interview requests, requests for comment, and requests for information) that we receive, or address reports in the media that concern us, we may process personal data relating to journalists, reporters and other media professionals. We may also send these persons corporate communications and other information by email for media and public relations purposes.	Legitimate interests – to ensure that our business is fairly and accurately represented in the media. Legitimate interests – to provide the right information to those who request it or otherwise have an interest in receiving it.

(iv) Advertising and Marketing Activities

Purpose and Personal Data Processed	Description	Lawful Basis
Marketing communications *Marketing and Service Communication Data*	To promote our Website, our Products and Services, or to otherwise promote our business, via email, telephone or post.	Consent (where marketing via email). Legitimate interests (where marketing via telephone and post) – to grow our business. You can unsubscribe from our email marketing by clicking the 'unsubscribe' link in our emails. You can also ask us to stop using your personal data for our direct marketing activities by contacting us using the contact details set out at the beginning of this Privacy Notice.
Link building/advertising requests *Marketing and Service Communication Data*	From time to time, we may email websites to request advertising or link opportunities/link partnerships.	Legitimate interests – to effectively promote our business
Prize draws, prize competitions and other promotions *Marketing and Service Communication Data*	To administer prize draws, prize competitions and other promotions that we run. Please note that our prize draws, prize competitions and other promotions are subject to separate terms and conditions and further information about how we use your personal data may be provided when you enter.	Performance of a contract (e.g. the promotion terms and conditions). Legitimate interests – to administer our promotion fairly and effectively and to comply with self-regulatory codes governing the operation of promotions.

(v) Business Administration, Compliance and Legal Affairs

Purpose and Personal Data Processed	Description	Lawful Basis
Business administration and legal compliance *Enquiry Data* *Customer Data* *Usage Data* *Technical Data* *Marketing and Service Communication Data*	To comply with our legal obligations. To keep appropriate records. To enforce our legal rights or defend against potential legal claims. To protect the rights of third parties. To facilitate a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.	Legitimate interests – to operate our business effectively. Compliance with a legal obligation.

5 If you do not provide personal data

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to fulfil any obligations that we owe to you, and we may not be able to enter into or perform a contract with you. This may apply where you do not provide personal data that we need to provide our Products and Service. In these circumstances, we may have to cancel the provision of the relevant Products and Services to you.

6 Disclosures of your personal data

We only share personal data with third parties when we are legally permitted to do so.

The circumstances where we may typically share personal data are set out below, though there may be other circumstances where we need to share personal data that are not set out below:

- Rehab clinics in our referral network – where you have authorised.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

7 Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

If any personal data is only useful for a short period, we will not retain it for longer than the period for which it is used by us. This applies in particular where we receive an enquiry but we do not make a referral to a third party rehab clinic – in this case we immediately delete the personal data that we received.

For tax purposes the law requires us to keep basic information about our customers (including contact, identity, and certain financial and transaction data) for six years after they stop being customers.

In some circumstances, we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8 Your legal rights

You have the following rights in relation to your personal data:

- **Your right of access.** If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
- **Your right to rectification.** If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've shared your personal data with so that you can contact them.
- **Your right to erasure.** You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
- **Your right to restrict processing.** You can ask us to "block" or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
- **Your right to data portability.** You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
- **Your right to object.** You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else's legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
- **Your rights in relation to automated decision-making and profiling.** You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.
- **Your right to withdraw consent.** If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact

details set out at the beginning of this Privacy Notice or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.

- **Your right to lodge a complaint with the supervisory authority.** If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details set out at the beginning of this Privacy Notice. You can also report any issues or concerns to a national supervisory authority in the Member State of your residence or the place of the alleged infringement. You can find a list of contact details for all EU supervisory authorities at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. As we are incorporated in the United Kingdom, our regulatory authority is the Information Commissioner's Office ("**ICO**"). Contact details for the ICO can be found on its website at https://ico.org.uk

9 Third-party links

Our 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 notice of every website you visit.

10 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when Websites set or access cookies.