

## ***Who we are?***

Surgical Holdings Limited (company number 03090951), trading as Surgical Holdings, is a limited company incorporated in England and Wales and is a 'controller' under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

## ***Whose data do we hold?***

We may hold data about the following people:

- Employees
- Customers
- Employees and staff of Customers
- Suppliers and service providers
- Advisers, consultants and other professional experts
- Complainants and enquirers.

## ***What data we will collect?***

Where we are the controller of the data, we will only collect information from you that is relevant to the matter that we are dealing with. In particular, we may collect the following information from you which is defined as 'personal data':

- Personal details, such as name, address, phone number and email address
- Financial details
- Business activities of the person whose details we are processing

We may also process your data on behalf of our customers or stakeholders, in which case we do so purely as a processor on behalf of that customer or stakeholder as controller.

## ***Special Categories***

We may also collect information that is referred to as being in a 'special category'. This could include:

- Racial or ethnic origin
- Religious beliefs or other beliefs of a similar nature
- Sexual orientation.

## ***Basis for processing***

The basis on which we process your personal data is one or more of the following:

- It is necessary for the performance of our contract with you or with our Customer, to which you are affiliated
- It is necessary for us to comply with a legal obligation
- It is in our legitimate interest to do so
- You have given us your consent (this can be withdrawn at any time by contacting Daniel Coole).

## ***How will we use your data?***

We may use your information for the following purposes

- Maintaining accounts and records

## ***Who will we share your data information with?***

- Service providers based in the United Kingdom who provide IT and system administration services to us
- Debt collection agencies if do not pay invoices issued by Surgical Holdings.

## ***How long will we keep your information for?***

- By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

## ***International transfers***

- We may from time to time transfer your personal data to a country outside of the EEA. For example, when we store personal data on a cloud server.
- It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers.

## ***Security arrangements***

- We shall ensure that all the information that you provide to us is kept secure using appropriate technical and organisational measures.
- In the event of a personal data breach, we have in place procedures to ensure that the effects of such a breach are minimised and shall liaise with the Information Commissioner's office (ICO) and with you as appropriate.
- More information can be obtained by contacting Daniel Coole.

## ***What rights do you have?***

You have the following rights under the GDPR:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

## ***Who can you complain to?***

- If you are unhappy about how we are using your information or how we have responded to your request, then initially you should contact Daniel Coole.
- If your complaint remains unresolved then you can contact the ICO, details available at [www.ico.org.uk](http://www.ico.org.uk)