



Privacy and Cookie Policy

Introduction

Welcome to Hire A Dental Surgery - privacy and cookie policy.

Hire A Dental Surgery respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (www.hireadentalsurgery.com) ("**Website**") (regardless of where you visit it from), or our premises or when you provide personal data to us offline and tell you about your privacy rights and how the law protects you. Please note, any references to use of our Website include references to use of our mobile application.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how Hire A Dental Surgery collects and processes your personal data through:

- Your use of our Website, including any data you may provide to us when you use the "contact us" section of our Website, sign up to our newsletters, purchase a product or service, apply or register to be an Hire A Dental Surgery Member (see below), or use our live chat tool on the Website;
- Your visit to our premises, whether as:
 - A wellness, fitness or medical professional, including but not limited to those offering healthcare, aesthetic or therapeutic services, operating their business from our premises (our "Hire A Dental Surgery");
 - A client (or their guest) of one of our Hire A Dental Surgery Members (i.e. those visiting our premises in order to receive services from the Hire A Dental Surgery Members) ("**Client**")
 - Where services at our premises are not provided by an Hire A Dental Surgery Member, and are instead provided by Hire A Dental Surgery employees, recipients of those services ("**In-House Service Users**").
- Your application or registration as an Hire A Dental Surgery Member if you submit your application or registration other than via our Website.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.



Controller

HIRE DENT Ltd t/a Hire A Dental Surgery, a company registered in England and Wales with company number **16516319** whose registered address is at Hire A Dental Surgery – **1 Albert Road, Cheadle Hulme, Stockport, United Kingdom, SK8 5DB** is responsible for and the controller of your personal data (collectively referred to as "Hire A Dental Surgery", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (see below), please contact the DPO using the details set out below.

Contact details

DPO name: **Lisa Coulson**

Email address: dpo@hireadentalsurgery.com

Postal address: **UNTIL – Ilona Rose House, Ground/Lower Ground, 111 Charing Cross Road, London. WC2H 0DT**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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 the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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 policy of every website you visit.

2. THE DATA 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 different kinds of personal data about you which we have grouped together as follows, as applicable to the services available to you depending on whether you are an Hire A Dental Surgery Member, a Client, or an In-House Service User:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Professional Data** includes details of qualifications and registration with professional bodies.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Website, products and services, and information about the dates, times, and durations for which you are accessing our premises by way of an access token.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will 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 feature or entering our premises at certain times of day or on certain days of the week. 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.

Special Categories of Personal Data

Special Categories of personal data include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data and information about criminal convictions and offences.

The processing of Special Categories of personal data requires higher levels of protection.

We may process information about your physical and mental health in order to comply with our legal obligations, including under the Health and Safety at Work etc. Act 1974.

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, 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 (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply to become one of our Hire A Dental Surgery Members;
 - successfully register as one of our Hire A Dental Surgery Members;
 - create an account on our Website;
 - subscribe to our services or publications;
 - request marketing to be sent to you; or
 - give us feedback, complete surveys or contact us.
- **Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see further details about cookies below at section 10.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:

Technical Data from the following parties:

analytics providers such as Google (including Google Analytics Limited and Google Ads Ltd) based outside the UK, Hotjar UK Limited, based inside the UK;

advertising networks such as HubSpot UK Holdings based inside the UK.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Vald, Webflow, Inc, AWS, Stripe Payments UK Ltd and Calendly Software Ltd, Cal.com, Knock Inc, Melograno Venture Studio-Amelia software.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you
- 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.
- Where we need to comply with a legal obligation.

Our Glossary below will tell you more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

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 including basis of legitimate interest
To register as a new Hire A Dental Surgery Member	(a) Identify (b) Contact (c) Professional	Performance of a contract with you
To process and deliver the services you require, either as an	(a) Identity (b) Contact (c) Financial (d) Transaction (e)	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>Hire A Dental Surgery Member</p> <p>Member, a Client, or an In-House Service User: (a) Manage payments, fees and charges (b) Collect and recover money owed to us</p>	<p>Marketing and Communications</p>	
<p>To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>(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 customers us</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business</p>
<p>To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant Website content and advertisements to you and measure or understand the</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them,</p>

effectiveness of the advertising we serve to you	Communications (f) Technical	to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To ensure that you will be safe on our premises	(a) Health	(a) Compliance with a legal obligation (b) Necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased our services and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to communications relating to any membership you may have with us, either as an Hire A Dental Member, a Client, or an In-House Service User.

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.

5. DISCLOSURES OF YOUR PERSONAL DATA

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

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our 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.

6. INTERNATIONAL TRANSFERS

We may transfer your personal data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data;
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. DATA SECURITY

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.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We will retain your personal data only for the period necessary to fulfil the purposes outlined in this Privacy and Cookie Policy, unless a longer period is required by law.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will 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.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You can:

- 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:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - 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 at contact@hireadentalsurgery.com.

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 could 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 could 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.

10. 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 our Website.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website..
- Analytical or performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting or advertising cookies. These cookies record your visit to our Website, the pages you have visited and the links you have followed. We will use this information to make our Website and the advertising displayed on it more relevant to your interests. [We may also share this information with third parties for this purpose.]

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title Cookie Name	Purpose
Cookie Title: Strictly necessary/session cookies. Cookie Name(s): · __hsrc	These cookies are essential for our Website to operate.
Cookie Title: Analytical or performance cookies Cookie Name(s): · _hjid · _hjFirst Seen · uvc · _ga · _gid · _gid_UA-125372476-1 · _hjIncludedInPageviewSample · _hjAbsoluteSessionProgress · __hstc · hubspotuktk · AnalyticsSyncHistor	These cookies enable us to estimate our audience size and usage pattern. They are generally operated by Google Analytics, Hotjar and Hubspot.

<p>Cookie Title: Analytical or performance cookies Cookie Name(s): · _hjid · _hjFirst Seen · uvc · _ga · _gid · _gid_UA-125372476-1 · _hjIncludedInPageviewSample · _hjAbsoluteSessionProgress · __hstc · hubspotuktk · AnalyticsSyncHistory</p>	<p>These cookies enable us to estimate our audience size and usage pattern. They are generally operated by Google Analytics, Hotjar and Hubspot.</p>
<p>Cookie Name: Targeting or advertising cookies Cookie Name(s): · _fbp · loc · bscookie · User MatchHistory</p>	<p>These cookies enable us to make any advertising on our Website personalised and targeted to you</p>

Third parties and cookies

Please note that the following third parties may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies are likely to be analytical cookies or performance cookies or targeting cookies:

- Hotjar
- Hubspot
- Meta (including but not limited to Facebook and Instagram)
- Google Analytics
- LinkedIn

IntercomThose third parties will use your data in accordance with their own privacy policies and you should ensure you are comfortable with those privacy policies before sharing your data with a third party. To deactivate the use of third-party advertising cookies, you can do so by visiting www.hireadentalsurgery.com

Blocking cookies

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website.

Expiry of cookies

Except for essential/session cookies which expire on exit of the “session” (i.e. any period of time during which you are browsing our Website), all cookies collected on our Website will expire after 2 years.

11. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Hire A Dental Surgery Member Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

External Third Parties

Service providers acting as processors based in the UK who provide [IT and system administration services].

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances