

## The Dental Survey Privacy Policy

The dental Survey is a brand of Manan Limited, a company committed to protect and respect your privacy.

The Company means, Manan Limited whose registered office is James House, Yew Tree Road, Warrington WA3 3JD

The Survey means, The Patient Survey 2021/2022

A "Survey Respondent" means, anyone who fills out The Patient Survey

A "Site Visitor" is anyone who visits our sites

This Privacy Policy & Notice applies to The Company

By filling out The Patient Survey you agree to our Privacy Policy & Notice. Specifically, you agree to us processing your personal data as described in this Privacy Policy & Notice. Furthermore, if you have enabled the use of cookies on your web browser, then you agree to our use of cookies as described in this Privacy Policy & Notice.

This Privacy Policy & Notice does not provide any additional terms and conditions nor warranties whether expressly or implied. All terms and conditions are on the Terms of Use page. This Privacy Policy & Notice provides transparency to our users as how their personal data is collected and used and serves as a privacy notice as required by legislation.

If you have any further queries, please don't hesitate to contact [info@mananltd.com](mailto:info@mananltd.com)

### Changes to this policy

We may change this Privacy Policy & Notice at any time by updating this document. We will endeavour to provide you with a notice of change of this page if any amendments occur. If you do not agree with the amendments please discontinue use of our site, otherwise, you will be deemed to have consented expressly to any changes.

### Introduction

This Privacy Policy & Notice describes how we capture and use personal data that we collect from the Patient Survey

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The Company acts as a data controller for all personal data which survey respondents fill out For the purpose of this policy

### Privacy of Survey Respondents

The information The Company collects about Survey Respondents

- We anonymously collect your survey responses
- We then store those survey responses for 60 days after the survey closes. After which all data will be deleted.

If you would like your survey responses erased, rectified, accessed or for any other queries about your responses, please contact us on [info@mananltd.com](mailto:info@mananltd.com)

We do not use your survey responses for any purpose other than carrying out statistical analysis.

We will share anonymised data and analysis with a third-party company (Software of Excellence) and with the dental practice corresponding to the code you enter at the beginning of the survey. We do not sell your survey data to any third parties nor do we store it to contact you for any purpose.

### **Personal Information**

We will not collect any personal information in the course of completing the Patient Survey.

### **Right to complain**

If you feel that we have mistreated the handling of your data, you have the right to complain to us, in which case we will resolve the matter as quickly as possible and prevent any further mishandling.

You also have the right to complain to the Information Commissioner's Office. The ICO can be contacted on [www.ico.org.uk](http://www.ico.org.uk)

### **Necessary disclosure by law**

Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on our website.

### **General Statement**

For this section, the following definitions apply:

**Controller:** the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Personal data:** any information relating to an identified or identifiable natural person ("Data Subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Data subject:** any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

**Processor:** a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Recipient:** a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State

law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Third party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Restriction of processing: the marking of stored personal data with the aim of limiting their processing in the future.

Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Consent: Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them.

### **Legal Basis**

In addition to the legal basis mentioned above, we may also possess the following legal basis for processing the data subject's personal data where:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or,
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

### **Data Subject Rights**

Certain regulations afford EU Data Subjects with rights. These rights are summarised below. In order to assert any of these rights please contact our DPO or another employee of The Company at any time.

**Right to Confirmation:** Each data subject has the right to obtain from The Company (acting as controller) confirmation as to whether or not his or her personal data is being processed. This includes the right to confirm whether his or her personal data is transferred to a third country or to an international organisation as well as the appropriate safeguards relating to the transfer.

**Right to Access:** Each data subject has right to obtain from The Company (acting as controller), free information about his or her personal data stored at any time and a copy of this information, however, The Company reserves the right to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

**Right to Rectification:** Each data subject has the right to rectify inaccurate personal data concerning him or her that is being processed by The Company (acting as controller) without undue delay. Furthermore, the data subject has the right to complete any incomplete personal data and to provide supplementary statements to rectify that personal data.

**Right to Erasure:** Each data subject has right to erase any personal data concerning him or her which is being processed by The Company (acting as controller) without undue delay. The Company may refuse to grant you this right if a statutory exemption applies.

**Right of Restriction of Processing:** Each data subject has the right to restrict the processing of personal data from The Company (acting as controller) where a statutory ground applies.

**Right to Data Portability:** Each data subject has the right to receive the personal data concerning him or her, which was provided to The Company (acting as controller), in a commonly used machine-readable format.

**Right to Object:** Each data subject has the right to object to The Company (acting as controller) to the processing of his or her personal data if a statutory basis exists.

**Right not to be subject to automated individual decision-making, including profiling:** Each data subject has the right not to be subject to a decision based solely on automated processing, including profiling.

**Right to Withdraw Consent:** Where consent forms the basis for processing by The Company (acting as controller), the data subject has the right to withdraw his or her consent to the processing of his or her personal data at any time. Data Subjects can contact [info@mananltd.com](mailto:info@mananltd.com) to withdraw consent at any time.

**Right to Complain to the Supervisory Authority (Information Commissioner's Office (ICO)):** Details of the ICO are provided at the top of this Privacy Policy & Notice.

#### Security of processing

The Company has implemented technical and organisational measures to ensure personal data processed remains secure, however, absolute security cannot be guaranteed. Please contact [info@mananltd.com](mailto:info@mananltd.com) for further details.

#### Cookies

"Cookies" are used in some areas of the Manan website to make it more user-friendly and to customise it to fit your needs in an optimal way. "Cookies" are small text files stored locally on the hard drive of your computer. They are there to keep available information for retrieval at a later

time in order to facilitate the use of our online services. When your visit is over and you close the browser you were using cookies are deleted automatically. Full details of Manan's cookie policy can be found [here](#).

#### **Law & Jurisdiction**

This Privacy Policy & Notice is governed by and interpreted according to the law of England and Wales. All disputes arising out of this Privacy Policy & Notice will be subject to the exclusive jurisdiction of the English and Welsh courts.

#### **Transfer of Rights**

You may not transfer any of your rights under this Privacy Policy & Notice to any other person. We may transfer our rights under this privacy notice where we reasonably believe your rights will not be affected.

#### **Invalid provisions**

If any court or competent authority finds that any provision of this Privacy Policy & Notice (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Policy & Notice will not be affected.