

## **Enderbys of Boston Limited - Privacy Notice - Last Updated 12.04.2018**

This Privacy Notice sets out the basis on which we will process the personally identifying information ('Personal Data') that we collect and receive from and about patients and customers who register in practice and the users of our websites ([www.enderbys.co.uk](http://www.enderbys.co.uk) and [shop.enderbys.co.uk](http://shop.enderbys.co.uk)), (together "the Sites"), visitors to our social media pages ([facebook.com/SeeEnderbys](https://facebook.com/SeeEnderbys), [twitter.com/See\\_Enderbys](https://twitter.com/See_Enderbys) and [plus.google.com/+EnderbysCoUk](https://plus.google.com/+EnderbysCoUk)) and those customers who purchase items or sign up for our newsletters online.

### **Our privacy commitments**

- We will only collect, keep, use and share Personal Data for legitimate business purposes that we explain here below, or if we're legally required to do so.
- We will be as clear and open as we can with you on what Personal Data we collect and how it will be processed.
- For as long as we maintain records of your Personal Data, we will keep it up to date and protect it with appropriate safety measures.

## **PATIENTS IN PRACTICE**

### **Data Collection**

We collect the following personal data from or about you as a patient or customer of Enderbys of Boston Limited:

- Personal data which is collected directly from you through our patient registration process: your name, phone number, postal address, email address, date of birth. The basis for the collection and processing of this data is for the provision of goods and services that Enderbys of Boston Limited offers.
- Other data which may be collected directly from you during the registration process (as appropriate): your NHS number, National Insurance Number, state benefits information. The basis for the collection and processing of this data is to enable Enderbys of Boston Limited to supply goods or services which may be paid in part or in full by institutions such as the NHS or using state benefits where appropriate.
- Data which may be collected directly from you by your optician or dispensing optician during your sight test, your spectacle dispensing or during the patient registration process (as appropriate): Medical records relating to your eye health, Family history of medical conditions relating to your eye health. The basis of the collection and processing of this data is for the accurate provision of goods or services that Enderbys of Boston Limited offers as well as the accurate referral of eye sight conditions to such doctors or medical practitioners (with your permission) for your treatment and care as appropriate.
- Personal data which may be collected during your sight test or during your visit to the Enderbys store(s): Sight test records (including such prescriptions, eye health conditions, retinal photographs or OCT scans as appropriate), sales records and spectacle dispensing records. The basis for collecting and processing this data is to allow for Enderbys of Boston Limited to monitor both the ongoing progression of your eyesight and any medical conditions where applicable as well as allowing the administration of purchases made at Enderbys.

## **Data Uses**

We use your Personal Data:

- For the provision of goods and services that Enderbys of Boston Limited offers
- To monitor both the ongoing progression of your eyesight and any medical conditions where applicable
- To contact such third parties as doctors or healthcare practitioners (with your permission) for the referral of eye health conditions and further treatment
- For the administration of your purchases
- To inform you of an upcoming sight test or about the progress of a recent order (collection ready, delay etc)
- To contact you with marketing messages which you have requested or agreed to receive from us (for example via a branded newsletter);
- To analyse the purchase history of our customers to provide a better experience for patients and customers

## **CCTV Footage**

Closed circuit television cameras are in operation at the Enderbys of Boston Limited store(s) and are signposted to inform customers that they are present. These cameras record 24 hours a day and records images only. The basis for collecting and processing this data is to allow for the safety and security of staff and customers present on the premises and also to allow for the safety of stock and the physical premises. Such images are kept for a period of 7 days at which point they are automatically deleted. If an incident involving crime or threats to the safety of the staff or customers of Enderbys of Boston Limited were to occur, images are transferred to the police services for processing.

## **Data Sharing**

Enderbys of Boston Limited will not sell your information. We will not share your information with any third party except as stated in this Privacy Notice or as required to operate the Sites, provide our services to you and administer your account.

## **WEBSITE VISITORS AND ONLINE CUSTOMERS**

### **Data Collection**

We collect the following personal data from or about you when visiting or purchasing from the Sites:

- Personal data collected at the Sites: Sales and purchasing records. The basis for collecting and processing this data is to allow for the administration of purchases made at the Sites of Enderbys of Boston Limited.
- Personal Data Collected Automatically from the use by you of the Sites. The data transmitted from your browser includes your IP address, the date and time of the visit the pages accessed, the access status/HTTP status code, site referrals, browsing pattern, browser type, location, your operating system and interface, as well as the language and version of the browser software. The basis for collecting and processing this personal data is to be able to operate the Sites and provide you with access to the pages you wish to access.

## **Data Uses**

We use your Personal Data:

- For the provision of goods and services that Enderbys of Boston Limited offers
- For the administration of your purchases
- To inform you about the progress of a recent order (collection ready, delay etc)
- To contact you with marketing messages which you have requested or agreed to receive from us (for example via a branded newsletter);
- To analyse the purchase history of our customers to provide a better experience for customers
- To analyse how customers use the Sites in order to provide a better experience for customers and visitors online

## **Cookies**

We use cookies (small text files which are transferred to your browser by the Sites) to identify data traffic patterns, personalise contents and support security. The cookies we use are described in more detail in our cookie statement. They do not provide any information which might disclose the identity of a specific person but they may potentially identify your computer, your browser and your internet settings. You may change the storing of cookies in your browser settings at any time by selecting the function "accept no cookies". However, disabling essential cookies may result in you no longer being able to use the entire functionality of the Sites.

## **Google Analytics**

Google Analytics, a web analytics service provided by Google, Inc. ("Google") places cookies on your computer, to enable Google to provide us with activity reports relating to the Sites. Google uses this data only to provide us with information on how users use the Sites and does not associate your IP address with any other data held by Google. The information generated by Google cookies about your use of the platform (including your IP address) will be transmitted to and stored by Google on servers in the United States. You may refuse these cookies by selecting the appropriate settings on your browser or by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

## **Data Sharing**

Enderbys of Boston Limited will not sell your information. We will not share your information with any third party except as stated in this Privacy Notice or as required to operate the Sites, provide our services to you and administer your account.

## **SOCIAL MEDIA FOLLOWERS**

### **Data Collection**

We receive the following Personal Data about you if you follow one of our social media accounts: Your account name and comments made on our social media pages. Our legal basis for processing this data is our legitimate interest in providing social media and marketing content that is of interest to our followers on social media.

## Data Uses

We use this Personal Data:

- To create targeted advertising across all our social media channels (for example by analysing responses to posts and existing advertisements);
- To find out more about our digital community (for example by analysing responses to posts and existing advertisements);

## Data Sharing

Enderbys of Boston Limited will not sell your information. We will not share your information with any third party except as stated in this Privacy Notice or as required to operate the Sites, provide our services to you and administer your account.

As a follower or visitor to Enderbys social media pages you should be aware that each social media platform has its own privacy policy which visitors can find here:

Facebook: <https://www.facebook.com/policy.php>

Twitter: <https://twitter.com/en/privacy>

Google+: <https://policies.google.com/privacy>

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## DATA PROCESSORS

We use third party processors to collect, export, process and store Personal Data on our behalf. The processors we use currently are the following:

- CRM Tool: Ocuco Acuitas, <https://www.ocuco.com/privacy/>
- CRM User Support and Maintenance: Ocuco Acuitas, <https://www.ocuco.com/privacy/>
- eCommerce Tool: Shopify, <https://www.shopify.com/legal/privacy>
- Online Payment Processor: Sage Pay, <https://www.sagepay.co.uk/policies/privacy-policy>
- Cloud Storage:
  - a. Google Drive, <https://cloud.google.com/security/compliance/eu-data-protection/>
  - b. Drop Box, <https://www.dropbox.com/help/security/data-transfers-europe-us>
- Web management tool:
  - a. Google Analytics, <https://policies.google.com/privacy>
  - b. Shopify, <https://www.shopify.com/legal/privacy>
  - c. Google Suite, <https://policies.google.com/privacy>
  - d. Technicks Solutions, <http://www.technicks.com/terms-conditions/>
- Social Media Platforms:
  - a. Facebook, <https://www.facebook.com/policy.php>
  - b. Twitter, <https://twitter.com/en/privacy>
  - c. Google+, <https://policies.google.com/privacy>

## International Data Transfers

We use some data processors located outside the European Economic Area only after taking such steps as are required to ensure that Personal Data they process on our behalf receives protection

equivalent to that provided in the EEA. Our processors are either certified as compliant with the EU-U.S. Privacy Shield Framework where they are located in the USA or have entered into an agreement with us containing the model clauses approved by the European Commission as providing contractual protection equivalent to that provided by the data protection regulations applicable in the EEA. To learn more about the Privacy Shield program, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

### **Data Security**

- We maintain technical and physical safeguards that are designed to protect the security and integrity of your Personal Data, and to guard it against accidental or unauthorised access, use, alteration or disclosure to unauthorised third parties. These measures include device encryption, firewalls and virus checking procedures.
- Where we keep Personal Data files on local devices these devices are protected and accessible only to authorised employees of Enderbys of Boston Limited.
- We regularly review our security systems to ensure that your Personal Data remains safe and secure.

### **Duration of Storage**

We will maintain records of your Personal Data:

- For as long as you remain a registered patient of Enderbys of Boston Limited;
- For as long as you remain a registered user of any of the Sites;
- If you have visited the Enderbys of Boston Limited store(s) for the purposes of a sight test, spectacle dispensing or purchase within the last 10 years (subject to GOC guidelines);
- If you have visited the Enderbys of Boston Limited store(s) or Sites for the purposes of a sight test, spectacle dispensing or purchase, while under the age of 18 until such time as you reach the age of 25 or have not visited the practice for 10 years (whichever is later) (subject to GOC guidelines);
- For as long as is necessary to provide our services to you.

If you have not visited the Enderbys of Boston Limited store(s) or Sites for the purposes of a sight test, spectacle dispensing or purchase in the last 10 years or having visited Enderbys of Boston Limited for the purposes of a sight test, spectacle dispensing or purchase while under the age of 18 have reached the age of 25 and have not visited Enderbys of Boston Limited store(s) or Sites for the purposes of a sight test, spectacle dispensing or purchase in the last 10 years, Enderbys of Boston Limited shall deem you to be an inactive patient and delete your details from our records except where retention is necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees.

### **Your Rights in Relation to Personal Data**

- You can update your contact or marketing preferences or unsubscribe from our marketing communications at any time by contacting a member of staff at an Enderbys of Boston Limited store.
- You have the right to update and correct the personal information on your account. You also have the right to request from us all personal information that we hold that relates to you, to request restriction of the processing of that data and to request that we delete that data. Where allowed by applicable law there may be an administrative charge for supply of copies of data and we may also require you to provide us with appropriate identification before we comply with this request. You also have the right to object to our continued processing of your

personal data. You may also have the right to data portability. If you have a complaint about the way in which we use your personal information you have the right to complain to the Information Commissioner [www.ico.gov.uk](http://www.ico.gov.uk).

- You can contact Enderbys of Boston Limited with questions about the personal information we hold about you at the email address in the contact section below.

### **Changes to our Privacy Notice**

We will update this Privacy Notice from time to time to reflect changes in our business. All such changes will be posted to the Sites and if we consider it to be appropriate we will notify subscribers of any material changes by email where possible.

### **Contacting us**

Enderbys of Boston Limited is the Data Controller in respect of any Personal Data that you submit to us or that we collect from or about you. We are a limited company registered in England and Wales, (Company Registration Number 07702064) with registered offices at 84 Wide Bargate, Boston, Lincolnshire PE21 6SE

If you would like to know what information we hold about you or if you have any other queries or complaints in relation to this Privacy Notice, or our Sites, our contact details are as follows:

- Enderbys of Boston Limited, 84 Wide Bargate, Boston, Lincolnshire PE21 6SE
- [info@enderbys.co.uk](mailto:info@enderbys.co.uk)
- 01205 311181