



cactus dental technology

CDT 6.0 Privacy Policy v1

Cactus Dental Technology Limited (“CDT”, “we”, “us” or “our”) values your privacy. (We know everyone says this, but we really mean it!) This Privacy Policy explains how we use, share and protect the personally identifiable information that we collect about you (“Personal Information”) and the choices you have. By using our services you are accepting and consenting to the practices described in this Privacy Notice. By sharing your personal information with us, you confirm that you have read and understood the terms of this privacy policy. We take responsibility for the personal information we collect about you, and we aim to be transparent about how we handle it, and give you control over it.

Information we collect

We collect a variety of information about our lovely customers (you!). We use the information to handle orders, deliver products and services, communicate with you about orders, products, services, update our records and generally maintain your accounts with us.

Here are the types of information we gather:

- your name, professional title, email address and telephone number(s)
- your company’s name, your position in the company; the company’s address, company’s email address and telephone number
- information required to provide you with a service, and details of our services that you have used

CDT may collect personal information which we receive when:

- you use our services
- you contact us

CDT occasionally performs shade taking services on behalf of the Dentist or Dental Practice, on patients at our premises. This is always in relation to the production of dental appliances commissioned by Dental Practice / Dentist. We collect:

- a patient reference to connect the shade details to the corresponding case
- details of the patients shade colourings in order to process the case
- confirmation from the patient that they are happy for us to store their shade secrets as per MDD requirements

Information you provide

This may include information which you provide when you:

- complete one of our prescription forms
- enter information on the www.cactusdentaltechnology.com website
- contact CDT directly in writing or by phone



Email Communication

As a user of our services, we may need to send you support communications by e-mail such as images of cases, questions about cases, delivery schedules and invoices/statements.

As long as you are happy for us to do so, we would also like to keep you up to date with other things that are happening at CDT which we think you might like to know about; whether it's our latest product announcements, offers, upcoming events or maybe just my new hair-do. If you do not wish to receive communications via email from us, or stop us contacting you altogether, then just let us know on 01349 867444 or hello@cactusdentaltechnology.com.

Direct Mail Communications (or good old fashioned Snail Mail)

We'd like to use your details to keep in touch by post from time to time.

Our postal communications are usually to tell you about our latest products, promotions and special offers or events. We use the information we have about you to get them there.

You can tell us at any time that you do not wish to receive postal communications from us. However, this may mean you don't hear about products and promotions or other work we do that may be of interest to you.

Use of Information

We use the information that we collect about you for the following (totally legit and normal) purposes:

- to operate our business, including the provision to you of information, products and services that you request and other transactional or administrative updates;
- to administer your account;
- inform you about products and services that we offer and that are similar to those you have already purchased or enquired about;
- to notify you about changes to our services, the Website or our Terms of Use and this Privacy Policy;

Data Sharing with Third Parties

We will never sell your personal information to anyone and only share it as outlined in this privacy policy or when you ask us to.

Third parties who provide services on our behalf

We share your personal information with approved third parties who provide services on our behalf, for example a Prosthetic Laboratory. They only have access to the data they need to perform those services. They are required to keep this data confidential and may not use it other than as we ask them to and always in accordance with this privacy policy.

The third parties who provide services on our behalf fall into the following categories:

- Those helping us to deliver products to you such as post and courier services
- Third parties that help us to provide services



Law Enforcement

We may disclose Personal Information in other circumstances as required by law. We also reserve the right to disclose your Personal Information when we believe such disclosure is appropriate to cooperate with an investigation of activities claimed to be unlawful, to enforce our Code of Conduct, or to protect the rights or property of CDT or others.

How long we keep your information

CDT will only retain our customers' personal information for as long as it needs it to carry out a purpose or meet a particular obligation. Once records have reached the end of their life according to the defined policy, they must be securely destroyed in a manner that ensures that they can no longer be used. The destruction procedure must allow for the correct recording of the details of disposal which should be retained as evidence.

This handy chart shows what, why, how and for how long we keep your juicy deets.

Record Category	Description	Retention Period	Reason for Retention Period	Allowable Storage Media
Dental Practice	Personal data, including customer names and order history	1 year after last purchase	Data protection requirement	Electronic/Paper
Supplier	Supplier names, addresses, company details	1 year after end of supply	Maximum period within which dispute might occur	Electronic/Paper
Contractual	Legal contracts, terms and conditions, leases	6 years after contract end	Maximum period within which dispute might occur	Electronic/Paper
Laboratory Patient Statement	Legal Requirement under Medical Devices Directive	5 years after transaction, but 10 years from 2020	MDD Requirement	Electronic
Laboratory Ticket/ Prescription	Legal Requirement under Medical Devices Directive	5 years after transaction, but 10 years from 2020	MDD Requirement	Electronic

Addressing Compliance with the GDPR

The following actions are undertaken to ensure that CDT complies at all times with the accountability principle of the GDPR:

- The legal basis for processing personal data is clear and unambiguous



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- All staff involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff
- Rules regarding consent are followed
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes
- The following documentation of processing activities is recorded:
 - Organisation name and relevant details
 - Purposes of the personal data processing
 - Categories of individuals and personal data processed
 - Categories of personal data recipients
 - Agreements and mechanisms for transfers of personal data to non-EU countries including details of controls in place
 - Personal data retention schedules
 - Relevant technical and organisational controls in place

These actions will be reviewed on a regular basis as part of the management review process of the information security management system.

Updating and access to your Personal Information

If you wish to change your name, e-mail address, and/or communication preferences, you can contact us at any time (I can't promise to be chirpy at 3am though).

If you are a resident of the European Union, you also have the right to request access to and correction of Personal Information that we hold about you. This right of access and correction can be exercised in accordance with the Data Protection Act 1998.

The Right to Erasure

Also known as "the right to be forgotten", the data subject (you) has the right to require CDT to erase personal data about them without undue delay where one of the following applies:

- The personal data are no longer necessary for the purpose for which they were collected
- The data subject withdraws consent and there is no other legal ground for processing
- The data subject objects to the processing of the personal data
- The personal data have been unlawfully processed
- For compliance reasons, i.e. to meet the legal obligations of CDT
- Where the personal data was relevant to the data subject as a child

We will need to make a decision on each case of such requests as to whether the request can or should be declined for one of the following reasons:

- Right of freedom of expression and information
- Compliance with a legal obligation
- Public interest in the area of public health
- To protect archiving purposes in the public interest
- The personal data is relevant to a legal claim



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Changes to this Privacy Policy

CDT may revise this Privacy Policy from time to time by posting a revised Privacy Policy on our Website and changing the last modified date in the footer of the Policy. If we make significant changes to the Privacy Policy, we will let you know either on our Website and/or contact you by email (I bet you can't wait!).

Contact Details

If you need to contact us here at Cactus Dental Technology Limited, regarding this Privacy Policy or just for a chat, you can:

- email us at hello@cactusdentaltechnology.com
- call us on 01349 867444
- write to us at: Cactus Club, Cactus Dental Technology Limited, Lockhart House, Tulloch Street, Dingwall, IV159JY

If, after speaking to us, you are not satisfied with our response, you can contact the Information Commissioner's Office (<https://ico.org.uk>) who is responsible for handling complaints about the use of personal information.

John Hewitt
Managing Director
Date: 07.02.17