



Website privacy notice

We are Pagari Ltd. We're a company registered in England and Wales with company number 15970077, whose registered address is 147 Station Road, London, England, E4 6AG. In this privacy notice we will refer to ourselves as '**we**', '**us**' or '**our**'. We are the Data Controller of the Personal Information we collect, hold, and use about you, as explained in this notice.

You can contact us in any of the following ways:

- a. by emailing us at info@pagarihealth.com; or
- b. by writing to us at 147 Station Road North Chingford, London, United Kingdom, E4 6AG.

We take the privacy, including the security, of Personal Information we hold about you seriously. This privacy notice tells you how we collect Personal Information about you and how we use that Personal Information. You should read this privacy notice carefully so that you know and can understand why and how we use the Personal Information we collect and hold about you.

We do not have a data protection officer but if you have any questions about this privacy notice or issues arising from it, you should contact John Afable, who is responsible for matters relating to data protection at our organisation, including any matters in this privacy notice. You can contact them using the details set out above.

We may issue you with other privacy notices from time to time, including when we collect Personal Information from you. This privacy notice is intended to supplement these and does not override them.

We may update this privacy notice from time to time. This version was last updated on 20th September 2024.

1. Key definitions

- 1.1. The key terms used in this privacy notice are defined below, for ease:
- 1.2. **Data Controller:** the organisation or person responsible for deciding how Personal Information is collected, stored and used.
- 1.3. **Data Processor:** a Data Controller may appoint another organisation or person to carry out certain tasks on its behalf in relation to the Personal Information. (This may include hosting of a site containing Personal Information, for example, or providing an email marketing service that facilitates mass distribution of marketing material to a Data Controller's customer base).
- 1.4. **Personal Information:** any information from which a living individual can be identified. It does not apply to information that has been anonymised.
- 1.5. **Special Information:** certain very sensitive Personal Information requires extra protection under data protection law. Sensitive data includes information relating to health, racial and ethnic origin, political opinions, religious and similar beliefs, trade union membership, sex life, and sexual orientation. It also includes genetic information and biometric information.

2. Details of Personal Information that we collect and hold about you

- 2.1. Set out in the table below are the general categories and details of retention periods in relation to those categories and, in each case, the types of Personal Information that we collect, use, and hold about you.

General category	Types of Personal Information in that category	Retention periods
Identity information	This is information relating to your identity such as your name (including any previous names and any titles you use), gender, marital status, and date of birth.	8 years from the conclusion of your treatment
Contact information	This is information relating to your contact details such as email address, addresses, phone numbers.	8 years from the conclusion of your treatment
Account information	This is information relating to your account with us (including username and password).	While your account remains active and for five years from the date it is marked inactive.

Payment information	This is information relating to the methods by which you provide payment to us such as bank account details, credit or debit card details and details of any payments (including amounts and dates) that are made between us.	For six months after our business relationship has ended, unless it is required by law to retain for a longer period.
Transaction information	This is information relating to transactions between us such as details of the goods, services, and/or digital content provided to you as well as any returns details.	For tax and accounting reasons seven years from the end of the tax year to which that information relates.
Marketing information	This is information relating to your marketing and communications preferences.	While you have opted into our marketing information and for a maximum of six months after you ask us to stop sending information.
Website, device and technical information	This is information about your use of our website and technical data which we collect (including your IP address, the type of browser you are using and the version, the operating system you are using, details about the time zone and location settings on the device, and other information we receive about your device).	Five years

- 2.2. We will only hold your Personal Information for as long as is necessary. How long is necessary will depend upon the purposes for which we collected the Personal Information and whether we are under any legal obligation to keep the Personal Information (for example, in relation to accounting or auditing records, or for tax reasons). We may also need to keep Personal Information in case of any legal claims, including in relation to any guarantees or warranties that we have provided with the goods and services.
- 2.3. The types of Personal Information we collect about you may differ from person to person, depending on who you are and the relationship between us.

3. Details of Special Information that we collect and hold about you

- 3.1. Special Information is explained in Section 1 above. We collect and hold the following types of special information about you:

- a. race;
- b. ethnic origin;
- c. genetics;
- d. biometrics;
- e. health;
- f. sex life;
- g. sexual orientation.

- 3.2. Where we do hold Special Information about you, our retention periods are as follows:

Type of Special Information	Retention periods
Information specified a-g above	8 years from the conclusion of treatment or death

- 3.3. We do not collect information from you relating to criminal convictions or offences.

4. Details of how and why we use Personal Information

- 4.1. We are only able to use your Personal Information for certain legal reasons set out in data protection law. There are legal reasons under data protection law other than those listed below; but, in most cases, we will use your personal information for the following legal reasons:

- a. **Contract Reason:** this is in order to perform our obligations to you under a contract we have entered into with you;
- b. **Legitimate Interests Reason:** this is where the use of your Personal Information is necessary for our (or a third party's) legitimate interests, so long as that legitimate interest does not override your fundamental rights, freedoms, or interests;
- c. **Legal Obligation Reason:** this is where we have to use your Personal Information in order to perform a legal obligation by which we are bound; and

- d. **Consent Reason:** this is where you have given us your consent to use your Personal Information for a specific reason or specific reasons.
- 4.2. As explained in Section 3 above, there are more sensitive types of Personal Information that require higher levels of protection. If we process such sensitive types of Personal Information, we will usually do so in the following circumstances:
- a. we have your explicit consent;
 - b. where it is necessary in relation to legal claims;
 - c. where you have made the Personal Information public.
- 4.3. So that we are able to provide you with goods and services, we will need your Personal Information. If you do not provide us with the required Personal Information, we may be prevented from supplying the goods and services to you.
- 4.4. It is important that you keep your Personal Information up to date. If any of your Personal Information changes, please contact us as soon as possible to let us know. If you do not contact us to keep your information updated, we may be prevented from supplying the goods and services to you. (For example, if you change address and do not tell us, your goods may be delivered to the wrong address).
- 4.5. Where we rely on consent for a specific purpose as the legal reason for processing your Personal Information, you have the right under data protection law to withdraw your consent at any time. If you wish to withdraw your consent, please contact us using the details set out at the beginning of this notice. If we receive a request from you withdrawing your consent to a specific purpose, we will stop processing your Personal Information for that purpose unless we have another legal reason for processing your Personal Information, in which case we will confirm that reason to you.
- 4.6. We explain in the table below the different purposes for which we use your Personal Information and, in each case, the legal reason(s) allowing us to use your Personal Information. Please also note the following:
- a. if we use the Legitimate Interests Reason as the legal reason for which we can use your Personal Information, we have also explained what that legitimate interest is; and
 - b. for some of the purposes, we may have listed more than one legal reason on which we can use your Personal Information, because the legal reason may be different in different circumstances. If you need confirmation of the specific legal reason that we are relying on to use your personal data for that purpose, please contact us using the contact details set out at the start of this privacy notice.

Purpose	Legal reason(s) for using the Personal Information
To register you as a customer	Contract Reason Legitimate Interests Reason (in order to offer you other goods, services, and/or digital content which helps us to develop our business)
To process your order, which includes taking payment from you, advising you of any updates in relation to your order, or any enforcement action against you to recover payment	Contract Reason Legitimate Interests Reason (in order to [recover money that you owe us])
To manage our contract with you and to notify you of any changes	Contract Reason Legal Obligation Reason
To comply with audit and accounting matters	Legal Obligation Reason
For record-keeping, including in relation to any guarantees or warranties provided as part of the sale of goods, services, and/or digital content	Contract Reason Legal Obligation Reason
To improve the goods, services, and/or digital content that we supply	Legitimate Interests Reason (in order to improve the goods, services, and/or digital content for future customers and to grow our business)
To recommend and send communications to you about goods, services, and/or digital content that you may be interested in. (More details about marketing are set out in section 11 below).	Legitimate Interests Reason (in order to grow our business) Consent Reason
To ensure the smooth running and correct operation of our website	Legitimate Interests Reason (to ensure our website runs correctly)

To understand how customers and visitors to our website use the website and interact with it via data analysis	Legitimate Interests Reason (to improve and grow our business, including our website, and to understand our customers' needs, desires, and requirements)
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4.7. Sometimes we may anonymise information you provide to us so that you can no longer be identified from it, and use this for our own purposes. In addition, sometimes we may use some of the information you provide to us together with other people's information to give us statistical data for our own purposes. Because this is grouped together with other information and you are not identifiable from that combined data, we are able to use this..

4.8. Under data protection law, we can only use your Personal Information for the purposes we have told you about unless we consider that the new purpose is compatible with the purpose(s) we told you about. If we want to use your Personal Information for a different purpose that we do not think is compatible with the purpose(s) we told you about, we will contact you to explain this and provide you with a supplementary privacy notice.

5. Details of how we collect Personal Information and Special Information

5.1. We usually collect identity information, contact information, payment information, transaction information, marketing information, Special Information; directly from you when you fill out a form, survey or questionnaire, purchase goods, services, and/or digital content from us, contact us by email, phone, in writing, or otherwise. This includes the Personal Information that you provide to us when you subscribe to our mailing list or enter a competition or survey.

5.2. We may receive some of your Personal Information from third parties or publicly available sources. This includes:

- a. contact information and payment information from our selected third-party suppliers;
- b. identity information and contact information from selected data brokers;
- c. identity information and contact information from publicly available sources such as Companies House;
- d. website, device and technical information from third parties such as analytics providers (e.g. Google);

5.3. We may also receive website, device, and technical information automatically from technologies such as cookies that are installed on our website.

6. Details about who Personal Information may be shared with

6.1. We may need to share your Personal Information with other organisations or people. These organisations include:

- a. Third parties who are not part of our group. These may include:
 - i. suppliers, such as IT support services, payment providers, administration providers, marketing agencies
 - ii. government bodies and regulatory bodies, such as HMRC, fraud prevention agencies;
 - iii. our advisers: such as lawyers, accountants, auditors, insurance companies who are based in the United Kingdom
 - iv. our bankers;
 - v. credit reference agencies;
 - vi. email platforms
- vii. Any organisations that propose to purchase our business and assets, in which case we may disclose your Personal Information to the potential purchaser.

6.2. Depending on the circumstances, the organisations or people who we share your Personal Information with will be acting as either Data Processors or Data Controllers. Where we share your Personal Information with a Data Processor, we will ensure that we have in place contracts that set out the responsibilities and obligations of us and them, including in respect of security of Personal Information.

6.3. We do not sell or trade any of the Personal Information that you have provided to us.

7. Details about transfers to countries outside of the EEA

7.1. We do not transfer your Personal Information outside of the EEA.

8. Automated decision-making

8.1. 'Automated decision making' is where a decision is automatically made without any human involvement. Under data protection laws, this includes profiling. 'Profiling' is the automated processing of Personal Information to evaluate or analyse certain personal aspects of a person (such as their behaviour, characteristics, interests and preferences).

8.2. Data protection laws place restrictions upon us if we carry out any automated decision-making (including profiling) that produces a legal effect or similarly significant effect on you.

8.3. We do not carry out any automated decision making (including profiling) that produces a legal effect or similarly significant effect on you. If we decide to do this, we will notify you and we will inform you of the legal reason we are able to do this.

9. Your rights under data protection law

9.1. Under data protection laws you have certain rights in relation to your Personal Information, as follows:

- a. **Right to request access:** (this is often called 'subject access'). This is the right to obtain from us a copy of the Personal Information that we hold about you. We must also provide you with certain other information in response to these requests to help you understand how your Personal Information is being used.
 - b. **Right to correction:** this is the right to request that any incorrect Personal Information is corrected and that any incomplete Personal Information is completed.
 - c. **Right to erasure:** (this is often called the 'right to be forgotten'). This right only applies in certain circumstances. Where it does apply, you have the right to request that we erase all of your Personal Information.
 - d. **Right to restrict processing:** this right only applies in certain circumstances. Where it applies, you have the right to request that we restrict the processing of your Personal Information.
 - e. **Right to data portability:** this right allows you to request that we transfer your Personal Information to someone else.
 - f. **Right to object:** you have the right to object to us processing your Personal Information for direct marketing purposes. You also have the right to object to us processing Personal Information where our legal reason for doing so is the Legitimate Interests Reason (see Section 4 above) and there is something about your particular situation that means that you want to object to us processing your Personal Information. In certain circumstances you have the right to object to processing where such processing consists of profiling (including profiling for direct marketing).
- 9.2. In addition to the rights set out in Section 9, where we rely on consent as the legal reason for using your Personal Information, you have the right to withdraw your consent. Further details about this are set out in Section 4.
- 9.3. If you want to exercise any of the above rights in relation to your Personal Information, please contact us using the details set out at the beginning of this notice. If you make a request, please note:
- a. we may need certain information from you so that we can verify your identity;
 - b. we do not charge a fee for exercising your rights unless your request is unfounded or excessive; and
 - c. if your request is unfounded or excessive, we may refuse to deal with your request.

10. Marketing

- 10.1. You may receive marketing from us about similar goods and services, where either you have consented to this or we have another legal reason by which we can contact you for marketing purposes.
- 10.2. However, we will give you the opportunity to manage how or if we market to you. In any email we send you, we provide a link to either unsubscribe or opt out, or to change your marketing preferences. If you have an account with us, you can log in to your account and manage your preferences there too. To change your marketing preferences and/or to request that we stop processing your Personal Information for marketing purposes, you can always contact us on the details set out at the beginning of this notice.
- 10.3. If you request that we stop marketing to you, this will not prevent us from sending communications to you that are not to do with marketing, for example in relation to goods and services that you have purchased from us.
- 10.4. We do not pass your Personal Information on to any third parties for marketing purposes.

11. Complaints

- 11.1. If you are unhappy about the way that we have handled or used your Personal Information, you have the right to complain to the UK supervisory authority for data protection, which is the Information Commissioner's Office (**ICO**). Please contact us in the first instance if you wish to raise any queries or make a complaint in respect of our handling or use of your Personal Information, so that we have the opportunity to discuss this with you and to take steps to resolve the position. You can contact us using the details set out at the beginning of this privacy notice.

12. Third-party websites

Our website may contain links to third-party websites. If you click and follow those links, they will take you to the third-party website. Those third-party websites may collect Personal Information from you, and you will need to check their privacy notices to understand how your Personal Information is collected and used by them.