

# DATA TERMS AND CONDITIONS

Email [info@azuredentalclinic.co.uk](mailto:info@azuredentalclinic.co.uk) Or Call 01704871743 (24/7)

## Privacy Notice

The practice aims to meet the requirements of the Data Protection Act 2018, the General Data Protection Regulation (GDPR), the guidelines on the Information Commissioner's website as well as our professional guidelines and requirements.

The data controller is the practice owner, who is also the information Governance Lead and the Data Protection Officer.

This Privacy Notice is available on the practice website, at reception, by email by calling the practice.

Telephone: 01704871743

Email: [info@azuredentalclinic.co.uk](mailto:info@azuredentalclinic.co.uk)

You will be asked to provide personal information when joining the practice. The purpose of us processing this data is to provide optimum health care to you.

The categories of data we process are:

Personal data for the purposes of staff and self-employed team member management

Personal data for the purposes of [direct mail/email/text/other] marketing

Special category data including health records for the purposes of the delivery of health care

Special category data including health records and details of criminal record checks for managing employees and contracted team members

We never pass your personal details to a third party unless we have a contract for them to process data on our behalf and will otherwise keep it confidential. If we intend to refer a patient to another practitioner or to secondary care such as a hospital we will gain the individual's permission before the referral is made and the personal data is shared.

Personal data is stored in the EU whether in digital or hard copy format

Personal data is stored in the US in digital format when the data storage company is certified with the EU-US Privacy Shield

Personal data is obtained when a patient joins the practice, when a patient is referred to the practice and when a patient subscribes to an email list

The lawful basis for processing special category data such as patients' and employees' health data is:

Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or

social care systems and services on the basis of Union or Member State law or a contract with a health professional

The lawful basis of processing personal data such as name, address, email or phone number is:

Consent of the data subject

Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

[Other]

The retention period for special data in patient records is a minimum of 10 years and may be longer for complex records in order to meet our legal requirements. The retention period for staff records is 6 years. The retention periods for other personal data is 2 years after it was last processed. Details of other retention periods are available in the Record Retention procedure available from the practice.

You have the following personal data rights:

The right to be informed

The right of access

The right to rectification

The right to erasure (clinical records must be retained for a certain time period)

The right to restrict processing

The right to data portability

The right to object

Further details of these rights can be seen in our Information Governance Procedures or at the Information Commissioner's website. Here are some practical examples of your rights:

If you are a patient of the practice you have the right to withdraw consent for important notifications, newsletters, surveys or marketing. You can inform us to correct errors in your personal details or withdraw consent from communication methods such as telephone, email or text. You have the right to obtain a free copy of your patient records within one month.

If you are not a patient of the practice you have the right to withdraw consent for processing personal data, to have a free copy of it within one month, to correct errors in it or to ask us to delete it. You can also withdraw consent from communication methods such as telephone, email or text.

We have carried out a Privacy Impact Assessment and you can request a copy from the details below. The detail of how we ensure security of personal data is in our Security Risk Assessment and Information Governance Procedures.

Comments, suggestions and complaints

Please contact the practice for a comment, suggestion or a complaint about your data processing.

Azure Dental  
6 The Beacons, 1 School Lane  
Formby  
L37 3LN  
Telephone: 01704871743  
Email: info@azuredentalclinic.co.uk

If you are unhappy with our response or if you need any advice you should contact the Information Commissioner's Office (ICO). Their telephone number is 0303 123 1113, you can also chat online with an advisor. The ICO can investigate your claim and take action against anyone who's misused personal data. You can also visit their website for information on how to make a data protection complaint.

#### Related practice procedures

You can also use these contact details to request copies of the following practice policies or procedures:

Data Protection and Information Security Policy, Consent Policy  
Privacy Impact Assessment, Information Governance Procedures  
Cookie And Privacy Policy

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of Azure Dental. The use of the Internet pages of Azure Dental is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Azure Dental. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, Azure Dental has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

#### 1. Definitions

The data protection declaration of Azure Dental is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR).

Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

A) Personal Data

Personal data means 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.

B) Data Subject

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

C) Processing

Processing is 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.

D) Restriction Of Processing

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

E) Profiling

Profiling means 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.

F) Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

#### G) Controller Or Controller Responsible For The Processing

Controller or controller responsible for the processing is 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.

#### H) Processor

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

#### I) Recipient

Recipient is 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.

#### J) Third Party

Third party is 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.

#### K) Consent

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

#### 2. Name And Address Of The Controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Azure Dental  
6 The Beacons, 1 School Lane  
Formby  
L37 3LN

Telephone: 01704871743  
Email: [info@azuredentalclinic.co.uk](mailto:info@azuredentalclinic.co.uk)

#### 3. Cookies

The Internet pages of Azure Dental use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, Azure Dental can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

If you take the opportunity to 'share' content with friends through social networks – such as Facebook and Twitter – you may be sent cookies from these websites. We don't control the setting of these cookies, so please check the third-party websites for more information about their cookies and how to manage them.

#### FURTHER INFORMATION ABOUT COOKIES

If you'd like to learn more about cookies in general and how to manage them, [aboutcookies.org](http://aboutcookies.org) (opens in a new window). If you'd like to opt out of cookies, please go to the Network Advertising Initiative website (opens in a new window).

Please note that we're not responsible for the content of external websites.

## How We Use Cookies

The list below shows all of the cookies that are set by this website and the third-party services we use. If you have any queries about these cookies or would like more information about them.

### First-Party Cookies (Cookies Set By Us)

These are cookies set by this website. Some are necessary to the functionality of the site, others provide information to us that we analyse to monitor and improve the site. These first-party cookies do not store or collect any personal information or anything that makes you personally identifiable to us. Typically, the cookies generate a random, unique number to store information about a user.

### First-party cookies (cookies set by us)

Name of cookie	Type of cookie	Expiry period	Reason for use of cookie
chcookie	Persistent cookie	2 months	Analytics
Used to improve our understanding of how people use our website and services, through web analytics			
_pk_id.1.fc5d	Persistent cookie	2 years	Analytics
Used to improve our understanding of how people use our website and services, through web analytics			
_pk_ses.1.fc5d	Session cookie		Analytics
Used to improve our understanding of how people use our website and services, through web analytics			
ch_session	Session cookie	At end of session	Strictly necessary
Used to manage the items stored in your shopping basket or your progress through filing transactions			
PIWIK_SESSID	Session cookie		Analytics
Used to improve our understanding of how people use our website and services, through web analytics			
Transaction	Persistent cookie	1 day	Your visit
WebFiling uses a cookie which remembers which service within WebFiling was being carried out in the event of a session timeout			
chwebcheck	Persistent cookie	1 year	Your visit
WebCheck uses a cookie which remembers the user for subsequent visits. The user is given the choice to explicitly allow this during login			
ch_survey	Persistent cookie	1 year	Your visit
Companies House website occasionally runs surveys which use a cookie which remembers if the user has a) chosen to not take part in the survey, or b) has already taken part in the survey.			
survey_ch	Persistent cookie	28 days	Your visit
Companies House website occasionally runs surveys which use a cookie which remembers if the user has a) chosen to not take part in the survey, or b) has already taken part in the survey.			

chwebsite\_survey Persistent cookie 7 days Your visit Companies  
 House website occasionally runs surveys which use a cookie which remembers if the user has a) chosen to not take part in the survey, or b) has already taken part in the survey.

### Third-party cookies (cookies set by other websites through this site)

We want to provide interesting and engaging content on our website. On a number of pages we use 'plug ins' or embedded media. For example, we embed YouTube videos and Google Maps in many pages. The suppliers of these services may also set cookies on your device when you visit the pages where we have used this type of content. These are known as 'third-party' cookies.

### Third-party cookies (cookies set by other websites through this site)

Name of cookie	Type of cookie	Expiry period	Reason for use of cookie
Description			
NID	Persistent cookie	6 months	Media This cookie is set by Google Maps when you visit any of our pages which includes an embedded Google Map
PREF	Persistent cookie	2 years	Media This cookie is set by Google Maps when you visit any of our pages which includes an embedded Google Map
testcookie	Session cookie		Media This cookie is set by Google Maps when you visit any of our pages which includes an embedded Google Map
khcookie	Session cookie		Media This cookie is set by Google Maps when you visit any of our pages which includes an embedded Google Map
SNID	Persistent cookie	6 months	Media This cookie is set by Google Maps when you visit any of our pages which includes an embedded Google Map
original_referer	Session cookie		Your visit This cookie is set by Twitter when you load any of our pages that include a list of "Latest Tweets"
_twitter_sess	Session cookie		Social networking This cookie is set by Twitter when you load any of our pages that include a list of "Latest Tweets"
guest_id	Persistent cookie	2 years	Social networking This cookie is set by Twitter when you load any of our pages that include a list of "Latest Tweets"
k	Persistent cookie	1 week	Social networking This cookie is set by Twitter when you load any of our pages that include a list of "Latest Tweets"
pid	Persistent cookie	2 years	Performance / Networking This cookie is set by Twitter when you load any of our pages that include a list of "Latest Tweets"
PREF	Persistent cookie	10 years	Media This cookie is set by YouTube when you load a video embedded on one of our pages
VISITOR_INFO01_LIVE	Persistent cookie	240 days	Media This cookie is set by YouTube when you load a video embedded on one of our pages
use_hitbox	Session cookie		Media This cookie is set by YouTube when you load a video embedded on one of our pages



## Shopping cart / transactional areas

There are some areas of our site that make use of shopping carts or forms technology which at times have to make use of cookies – the ones used on a permanent basis are detailed in the cookies table. From time to time we may add functionality to our site e.g. surveys, comparisons etc., and these often come from 3rd parties – we will endeavour to ensure full disclosure of any cookies.

## Areas of the site requiring a login

Accepting the use of login functionality, without exception, you must explicitly agree to the setting of specific cookies, which allow this area to function. The cookies in use for secure areas are provided within the terms and conditions of use for the appropriate area.

## How To Control And Delete Cookies

We will not use cookies to collect personally identifiable information about you. However, if you wish to restrict or block the cookies which are set by our websites, or indeed any other website, you can do this through your browser settings. The 'Help' function within your browser should tell you how.

Alternatively, you may wish to visit the About Cookies website, which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your machine as well as more general information about cookies.

## Cookies: Frequently Asked Questions

How to control cookies

How to delete cookies

Please be aware that restricting cookies may have an impact upon the functionality of our website.

If you wish to view your cookie code, just click on a cookie to open it. You'll see a short string of text and numbers. The numbers are your identification card, which can only be seen by the server that gave you the cookie.

For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual. To opt-out of third-parties collecting any data regarding your interaction on our website, please refer to their websites for further information.

## Local Shared Objects (Flash cookies)

### 4. Collection Of General Data And Information

The website of Azure Dental collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the

browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Azure Dental does not draw any conclusions about the data subject.

Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

Therefore, Azure Dental analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

#### 5. Registration On Our Website

The data subject has the possibility to register on the website of the controller with the indication of personal data. The respective input mask used for the registration determines which personal data is transmitted to the controller. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In

addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations. A Data Protection Officer particularly designated in this data protection declaration, as well as the entirety of the controller's employees are available to the data subject in this respect as contact persons.

#### 6. Subscription To Our Newsletters

On the website of Azure Dental, users are given the opportunity to subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data is transmitted, as well as when the newsletter is ordered from the controller.

Azure Dental informs its customers and business partners regularly by means of a newsletter about enterprise offers. The data subject may only receive the enterprise's newsletter if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller in a different way.

#### 7. Newsletter-Tracking

The newsletter of Azure Dental contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded

tracking pixel, Azure Dental may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analysed by the controller in order to optimize the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, the personal data will be deleted by the controller. Azure Dental automatically regards a withdrawal from the receipt of the newsletter as a revocation.

#### 8. Contact Possibility Via The Website

The website of Azure Dental contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

#### 9. Routine Erasure And Blocking Of Personal Data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

#### 10. Rights Of The Data Subject

##### A) Right Of Confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact our Data Protection Officer or another employee of the controller.

##### B) Right Of Access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

the purposes of the processing;

the categories of personal data concerned;  
the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;  
where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;  
the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;  
the existence of the right to lodge a complaint with a supervisory authority;  
where the personal data are not collected from the data subject, any available information as to their source;  
the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.  
Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may at any time contact our Data Protection Officer or another employee of the controller.

#### C) Right To Rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact our Data Protection Officer or another employee of the controller.

#### D) Right To Erasure (Right To Be Forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.

The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.

The personal data have been unlawfully processed.

The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Azure Dental, he or she may at any time contact our Data Protection Officer or another employee of the controller. The Data Protection Officer of Azure Dental or another employee shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. The Data Protection Officer of Azure Dental or another employee will arrange the necessary measures in individual cases.

#### E) Right Of Restriction Of Processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.

The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the Dentistry On The Square, he or she may at any time contact our Data Protection Officer or another employee of the controller. The Data Protection Officer of Azure Dental or another employee will arrange the restriction of the processing.

#### F) Right To Data Portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a

controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact the Data Protection Officer designated by Azure Dental or another employee.

#### G) Right To Object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Azure Dental shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Azure Dental processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Azure Dental to the processing for direct marketing purposes, Azure Dental will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Azure Dental for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may directly contact the Data Protection Officer of Azure Dental or another employee. In addition, the data subject is free in the context of the use of information society services, and

notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

#### H) Automated Individual Decision-Making, Including Profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Azure Dental shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may at any time directly contact our Data Protection Officer of Azure Dental or another employee of the controller.

#### I) Right To Withdraw Data Protection Consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may at any time directly contact our Data Protection Officer of Azure Dental or another employee of the controller.

#### 11. Legal Basis For The Processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations, which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health



insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company 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. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

**12. The Legitimate Interests Pursued By The Controller Or By A Third Party**  
Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favour of the well-being of all our employees and the shareholders.

**13. Period For Which The Personal Data Will Be Stored**  
The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

**14. Provision Of Personal Data As Statutory Or Contractual Requirement; Requirement Necessary To Enter Into A Contract; Obligation Of The Data Subject To Provide The Personal Data; Possible Consequences Of Failure To Provide Such Data**

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact our Data Protection Officer. Our Data Protection Officer clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

**15. Existence Of Automated Decision-Making**  
As a responsible company, we do not use automatic decision-making or profiling.

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