**Our Privacy Notice describes the categories of personal data we process and for what purposes.**

**Introduction and summary**

We know that your personal information is important to you. That’s why whenever we process it, we only use what we need to, and we do everything we can to ensure it is appropriately protected.

This notice explains the situations where we may process your personal data and the steps we take to protect it. In summary:

* Most of the personal information we collect is provided directly by you and is necessary to deliver the service you have requested. We only ask for the information that we absolutely need and are required to collect according to department of health minimum requirements.
* We do collect some personal information automatically – such as IP addresses, pages viewed on our website and links you’ve clicked on. This is predominantly through the placement of cookies which are explained in detail later.
* If you have given us appropriate permission to do so, we may send you information about products and services we offer. We will never sell your details to third parties for their own marketing purposes.
* We may share your information within our wider group of companies (explained later) where there is a legal need, or justified business need, to do so.
* Like most organisations, we use third parties to support the running of our business (e.g. using an application) and, in certain circumstances, these third parties may have access to your data. Where this is the case, we have appropriate protective measures in place to ensure your information is appropriately protected.
* With the exception of tailored marketing (as mentioned above) we do not make any automated decisions - i.e. a decision which does not involve a human providing an opinion - about you in delivering our services.

**Updating this notice**

This policy is under regular review and we may make changes to this notice at any time and will post a copy of them on our website. Any changes will take effect 7 days after the date on which we post the modified terms on the website. Your continued use of our services after that period expires means that you agree to be bound by the modified policy.

This privacy policy was last updated on 06/06/2022.

**Who are we?**

NL VitaCare is the trading name for NL VitaCare Ltd. When we say ‘we’ or ‘us’ we mean these companies.

**How can you contact us?**

By email at sales@NL-vitacare.com

By post to:

NL VitaCare

143-145 High street

Southgate

London

N14 6BP

If you specifically want to contact our Data Protection Officer, you can do so by emailing sales@NL-vitacare.com . Alternatively, you can write to them at:

Data Protection Officer
NL VitaCare

143-145 High street

Southgate

London

N14 6BP

**What if you need to complain about how we have used your personal information?**

You can make a complaint about how we have used your personal information to us by contacting our Data Protection Officer (using the details above).

You are also entitled to complain to the Data Protection Supervisory Authority – which in the UK is the Information Commissioner's Office (ICO). You can find their contact details at [https://ico.org.uk](https://ico.org.uk/)

**What are your privacy rights and how can you exercise them?**

Under law, you have the following rights:

* **Right of Access:**you have the right to know how we process your personal information (as explained in this notice) and also a right to receive a copy of your personal information.
* **Right of Rectification:**you can ask us to change or complete any inaccurate or incomplete personal information held about you.
* **Right to Object**: you have the right to object, in certain circumstances, to us processing your personal information. For example, you can object to us sending you marketing material or using your personal information to create a profile about you.
* **Right to Erasure:**in certain circumstances, you can ask us to delete your personal information. For example, where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
* **Right of Portability:**you have the right to ask us to send a copy of certain elements of your personal information (predominantly information you have shared directly with us) to another company.
* **Right to Restrict:**you can ask us to restrict the personal information we use about you where you have asked for it to be erased (and the erasure has not taken place or we were unable to erase the data when we should have) or where you have objected to our use of it.

To exercise the Right of Access, email us at sales@NL-vitacare.com or by letter to the address above.

Exercising your rights is free and we will respond to any request as quickly as we can. Under current law, we have up to one calendar month to respond to any request. We will endeavour to meet this. If we can’t, we’ll contact you to explain why and confirm when your request will be processed.

**What personal information do we collect and how is it used?**

What we collect and how we use it depends on how you interact with us and the specific services you’ve requested. This is outlined below.

* we capture your name, address, email, telephone number, passport number, date of birth, ethnicity, gender, flight details, departure and destination countries.
* We may process your payment card details to provide the services you have requested. We do not store these details.
* If you interact with us online (for example, when you use our website, digital services or post comments on our Facebook page) we will indirectly collect information about you. We collect certain usage information when you utilise our website such as Internet Protocol (“IP”) addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our website and the products and services we offer, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate our website. We collect this information for our own legitimate business interests to enable us to understand how digital services are used and how we can improve them.
If we sell part of our business then we may need to share your personal data with the new owner. We will place a notice on our website or notify you directly, to tell you that your personal information is being shared.
* If you enter one of our premises, we may capture you on CCTV. We use CCTV to ensure the safety and security of our staff and customers. The images captured may be used to prevent and detect crime, and therefore may be shared with law enforcement. We carry out this processing activity either for our own legitimate interest or for the wider public interest (e.g. where it is shared with law enforcement).
* If you fall ill in our premises, we will share your personal information, if we have it, with medical professionals to allow them to deliver appropriate treatment to you.

**Who do we share your personal information with?**

In the previous section we described particular instances where we share your personal information with others. There are also other third parties that we use to deliver services to you. In this section, we have summarised the categories of third parties who we may share your data with.

* Postal services and couriers – for typical business purposes, to deliver home testing kits.
* Third party content processors – for example, when we email your test report to you (e.g. an email delivery service)
* We are required by law to submit your personal details and COVID test result, and any other information collected as part of your selected service (fit to fly or test to release) to Public Health England each day.

**Where do we process your personal data from?**

Your data is processed on NL VitaCare ltd premises and is not transferred to any other party for processing.

**How long will we keep your personal information?**

We will retain your personal information for as long as we are legally or contractually required to do so, or for a period which is justifiable to meet our business needs. The exact retention period varies depending on the type information and purpose for use, if you require any further information on retention periods please contact us at sales@NL-vitacare.com .

**Marketing and profiling**

If you have given your consent, we will contact you about the products and services we offer.

We will send these communications to you by email. Every marketing communication we send will include instructions on how to opt-out. At any time, you can change your marketing preferences by emailing sales@NL-vitacare.com.

**Keeping you up to date**

In order to deliver our services to you, it is necessary to contact you using the contact mechanisms you have given us. This may be by issuing an email containing your COVID test report and sending an SMS message to confirm your registration and your COVID test report is ready for download. These communications are necessary for the service you have selected. You can inform us of particular communication preferences (e.g. email rather than phone call) and we will endeavour to follow your preferred mechanism. However, we reserve the right to use any contact information we have to deliver necessary information to you.

This content was written and edited by NL VitaCare ltd.