Privacy Policy

Version History

Date	Version	Reason for Change	Author
02/11/2023	1.0.0	Initial generation	Samit Biswas
17/12/2023	2.0.0	Document structure changed	Samit Biswas
17/12/2023	2.1.0	Sections updated: 1,2	Samit Biswas

Privacy policy

Introduction

Health Tech Services Group Limited respects the privacy of its customers, suppliers and partners. We have therefore formulated and implemented a policy on complete transparency regarding the processing of personal data, its purpose(s) and the possibilities to exercise your legal rights in the best possible way. For employees, we have formulated a separate privacy policy, available upon employment and upon request.

This privacy policy pertains to processing by Health Tech Services Group Limited by means other than through the use of cookies. Health Tech Services Group Limited has formulated a separate cookie policy, which can be found on our Health Tech Services Group Limited's websites: www.caresafe.io, www.hts.group

This policy applies to the Health Tech Services Group Limited group consisting of Health Tech Services Group Limited with subsidiaries

Health Tech Services Group Limited	
Subsidiary name:	Care Safe
Address:	Suite 6 Chalkwell Lawns, 648-656 London Rd, Westclifff on Sea SS09HR
Registration number:	

.
This policy applies to the Health Tech Services Group Limited group consisting of Health Tech Services Group Limited with subsidiaries

Care Safe	
Subsidiary name:	Care Safe
Address:	Office 1.14 Bay Technology Centre, Port Talbot SA127AX
Registration number:	

.
This policy applies to the Health Tech Services Group Limited group consisting of Health Tech Services Group Limited with subsidiaries

Care Safe	
Subsidiary name:	Care Safe
Address:	Unit 6 G/J Red Rose Court, BB21PS, Blackburn, United Kingdom
Registration number:	14817633

.

Definitions

- Party responsible for processing personal data: Health Tech Services Group Limited; with registered address at Unit 6 G/J Red Rose Court, Sunnyhurst Road, , in United Kingdom; company registration

number 14817633 and Data Protection Officer NAQ Cyber who can be reached at support@naqcuber.com (the "Controller").

- Data Protection Authority: The Data Protection Authority of United Kingdom.
- Data Protection laws:
  - For European citizens or residents, the EU GDPR 2018; the EU e-privacy directive 2002 (soon to be replaced by the EU e-privacy regulation);
  - For UK citizens or residents, the UK GDPR 2020 and the UK Data Protection Act 2018
  - and the national laws of the countries where we operate.

Collection of data

- Your personal data will be collected by Health Tech Services Group Limited and its data processors.
- 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.

The types of personal data we may process:

Business process	Type	Data subject	Legal basis
Website	Financial, Contracts, Protected characteristics, Technical data (e.g. source code), Date of Birth, Health, Location, Software, Tools, and Applications, Video, Copy of ID, Educational and Employment History, Identification, Photographs, Business data, Social Security Number	Employees, Partners, Customers, Patients	Consent
Email	Financial, Contracts, Protected characteristics, Technical data (e.g. source code), Date of Birth, Health, Location, Software, Tools, and Applications, Video, Copy of ID, Educational and Employment History, Identification, Photographs, Business data, Social Security Number	Employees, Partners, Customers, Contractors, Patients	Legitimate interest
Storage and exchange of documents	Financial, Contracts, Protected characteristics, Technical data (e.g. source code), Date of Birth, Health, Location, Software, Tools, and Applications, Video, Copy of ID, Educational and Employment History, Identification, Photographs, Business data, Social Security Number	Employees, Partners, Suppliers, Customers, Contractors, Patients	Legitimate interest
Delivery of goods and services	Financial, Contracts, Protected characteristics, Technical data (e.g. source code), Date of Birth, Health, Location, Software, Tools, and Applications, Video, Copy of ID, Educational and Employment History, Identification, Photographs, Business data, Social Security Number	Employees, Suppliers, Customers, Contractors, Patients	Performance of a contract
Financial and business administration	Financial, Contracts, Protected characteristics, Technical data (e.g. source code), Date of Birth, Health, Location, Software, Tools, and Applications, Video, Copy of ID, Educational and Employment History, Identification, Photographs, Business data, Social Security Number	Employees, Suppliers, Customers, Contractors, Patients	Legitimate interest
Marketing	Financial, Contracts, Protected characteristics, Technical data (e.g. source code), Date of Birth, Health, Location, Software, Tools, and Applications, Video, Copy of ID, Educational and Employment History, Identification, Photographs, Business data, Social Security Number	Employees, Partners, Suppliers, Customers, Contractors, Patients	Consent

Purposes

Health Tech Services Group Limited processes personal data for one or more of the following purposes:

- Customer, employee, contractor, partner or supplier management
- Business and financial administration
- Direct marketing

- Delivery of goods or services
- Work planning

How we collect, store or otherwise process your data:

The following business processes describe how we may collect, store or otherwise process the types of personal information set out in the table above:

- Collection of cookies, subscription to newsletter or filling out the contact form on the website(s);
- Analyse trends and profiles, for our legitimate interest to aim to enhance, modify, personalise and improve our services and communications for the benefit of our customers;
- Process and respond to support requests, enquiries and complaints received from you through use of business email;
- Provide services and products requested and/or purchased by you and to communicate with you about such services and/or products. We do this as necessary in order to carry out a contract with you and in accordance with our legitimate interest to operate a business;
- Carry out administrative activities such as invoicing and collecting payments either locally on devices or using cloud-services;
- Store and exchange personal information contained in documents through email and cloud-services;
- Marketing and customer acquisition through email or using cloud-services.

Sharing data with third parties

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your Personal Data outside United Kingdom. If we do, you can expect a similar degree of protection in respect of your Personal Data.

We will only share your Personal Data with third parties in accordance with the GDPR and as outlined in the legal justification table above.

We share your personal data with the following enterprise third parties. We also share your data with SME third parties, details of which are available upon request. You will be notified when we have engaged with a new third party recipient of your personal data.

Adobe

Function	Document Storage Service, Marketing Tool, Other Software Suite
Business process	Business Operations, Email, Marketing, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Software, Tools, and Applications
Data subjects	Partners
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Zoho

Function	Appointment Scheduling Tool, CRM, Customer Service, Document Storage Service, Email Provider, Marketing Tool, Office, Other Software Suite, Payment, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
	Business data, Contracts, Copy of ID, Date of Birth,

Data categories	Financial, Health, Identification, Location, Photographs, Protected characteristics, Software, Tools, and Applications, Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

eBay

Function	Appointment Scheduling Tool, CRM, Customer Service, Marketing Tool, Office, Other Software Suite, Payment, Payment Processing
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Apple iCloud

Function	Accountancy, Application Hosting, Appointment Scheduling Tool, Bookkeeping, CRM, Customer Service, Document Storage Service, Email Provider, Human Resources, Marketing Tool, Office, Other Software Suite, Password Manager, Payment, Payment Processing, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Employees
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

AWS

Function	Application Hosting, Appointment Scheduling Tool, CRM, Customer Service, Document Storage Service, Human Resources, Marketing Tool, Office, Other Software Suite, Password Manager, Payment, Payment Processing, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Patients
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

BrightHR

Function	Appointment Scheduling Tool, Bookkeeping, CRM, Customer Service, Document Storage Service, Human Resources, Office, Other Software Suite, Payment, Payment Processing, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Employees
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Calendly

Function	Appointment Scheduling Tool, CRM, Customer Service, Email Provider, Marketing Tool, Office, Other Software Suite, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Marketing, Production of content, Software, Tools, and Applications
Data categories	Business data, Contracts, Copy of ID, Location, Protected characteristics, Software, Tools, and

	Applications, Technical data (e.g. source code)
Data subjects	Patients
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Canva

Function	Application Hosting, CRM, Customer Service, Marketing Tool, Office, Other Software Suite, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Educational and Employment History, Identification, Location, Photographs, Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Employees
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Facebook Ads

Function	Appointment Scheduling Tool, CRM, Customer Service, Email Provider, Marketing Tool, Office, Other Software Suite, Payment Processing, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Health, Identification, Location, Photographs, Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Patients
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

X (Twitter)

Function	CRM, Customer Service, Marketing Tool, Office, Other Software Suite, Task Management/Work Planning, User Management/Authentication
	Administration, Business Operations, Delivery of

Business process	Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Website
Data categories	Business data, Copy of ID, Educational and Employment History, Identification, Location, Photographs, Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Crunchbase

Function	CRM, Customer Service, Marketing Tool, Office, Other Software Suite, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Educational and Employment History, Identification, Location, Photographs, Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Suppliers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Dropbox

Function	CRM, Customer Service, Document Storage Service, Human Resources, Marketing Tool, Payment, Task Management/Work Planning, User Management/Authentication
Business process	Business Operations, Delivery of Goods and Services, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Employees
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

FreeAgent

Function	Accountancy, Appointment Scheduling Tool, Bookkeeping, CRM, Customer Service, Document Storage Service, Email Provider, Human Resources, Marketing Tool, Office, Other Software Suite, Payment, Payment Processing, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Facebook Analytics

Function	Appointment Scheduling Tool, CRM, Customer Service, Marketing Tool, Office, Other Software Suite, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Educational and Employment History, Health, Identification, Location, Photographs, Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Firefox

Function	Application Hosting, Appointment Scheduling Tool, CRM, Marketing Tool, Office, Other Software Suite, Password Manager, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Employees
	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of

Security measures	unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Github

Function	Application Hosting, Appointment Scheduling Tool, Bookkeeping, CRM, Customer Service, Document Storage Service, Email Provider, Human Resources, Marketing Tool, Office, Other Software Suite, Password Manager, Payment, Payment Processing, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

GoDaddy

Function	Application Hosting, Appointment Scheduling Tool, CRM, Document Storage Service, Email Provider, Human Resources, Marketing Tool, Office, Other Software Suite, Password Manager, Payment, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Photographs, Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Google Ad Manager

Function	Appointment Scheduling Tool, CRM, Customer Service, Marketing Tool, Office, Other Software Suite, Payment, Payment Processing
	Business Operations, Delivery of Goods and Services,

Business process	Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Google Analytics

Function	Appointment Scheduling Tool, CRM, Customer Service, Marketing Tool, Office, Other Software Suite, Payment, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Google authenticator

Function	CRM, Other Software Suite, Password Manager, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Software, Tools, and Applications
Data categories	Business data, Educational and Employment History, Identification, Photographs, Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code)
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Google Workspace

	Application Hosting, Appointment Scheduling Tool,

Function	CRM, Document Storage Service, Email Provider, Human Resources, Office, Other Software Suite, Payment, Payment Processing, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Email, Marketing, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Employees
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Google Cloud

Function	Accountancy, Application Hosting, Appointment Scheduling Tool, Bookkeeping, CRM, Customer Service, Document Storage Service, Email Provider, Human Resources, Marketing Tool, Office, Other Software Suite, Password Manager, Payment, Payment Processing, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Grammarly

Function	CRM, Customer Service, Document Storage Service, Marketing Tool, Office, Other Software Suite, Task Management/Work Planning, User Management/Authentication
Business process	Business Operations, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Paper Documents
Data categories	Business data, Contracts, Educational and Employment History, Photographs, Protected characteristics, Software, Tools, and Applications, Technical data (e.g. source code)

Data subjects	Employees
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Hubspot

Function	Application Hosting, Appointment Scheduling Tool, CRM, Customer Service, Document Storage Service, Email Provider, Human Resources, Marketing Tool, Office, Payment, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Wise

Function	Accountancy, CRM, Customer Service, Office, Payment, Payment Processing, Task Management/Work Planning
Business process	Administration, Business Operations, Software, Tools, and Applications
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Financial, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code)
Data subjects	Contractors
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

SeedLegals

Function	Appointment Scheduling Tool, CRM, Customer Service, Document Storage Service, Email Provider, Human Resources, Marketing Tool, Office, Other Software Suite, Payment, Task Management/Work Planning, User Management/Authentication
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Production of content, Software, Tools, and Applications, Storage of Digital

	Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code)
Data subjects	Contractors
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Naq Cyber

Function	Accountancy, Application Hosting, Appointment Scheduling Tool, Bookkeeping, CRM, Customer Service, Document Storage Service, Email Provider, Human Resources, Marketing Tool, Office, Other Software Suite, Password Manager, Payment, Payment Processing, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Business Operations, Marketing, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Employees
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

LinkedIn

Function	Appointment Scheduling Tool, CRM, Customer Service, Marketing Tool, Office, Other Software Suite, User Management/Authentication
Business process	Administration, Business Operations, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Contractors
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

NatWest

Function	Accountancy, Bookkeeping, CRM, Customer Service, Human Resources, Office, Other Software Suite, Password Manager, Payment, Payment Processing
Business process	Administration, Business Operations, Delivery of Goods and Services, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Financial, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Employees
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Paypal

Function	Accountancy, Bookkeeping, CRM, Customer Service, Marketing Tool, Office, Payment, Payment Processing
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Financial, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code)
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Siteground

Function	Application Hosting, Appointment Scheduling Tool, CRM, Customer Service, Document Storage Service, Email Provider, Marketing Tool, Office, Other Software Suite, Payment, Task Management/Work Planning, User Management/Authentication, Website Hosting
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Educational and Employment History, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong

Security measures	authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Stripe

Function	Accountancy, Bookkeeping, CRM, Customer Service, Document Storage Service, Marketing Tool, Other Software Suite, Payment, Payment Processing
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Copy of ID, Date of Birth, Financial, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

Whatsapp

Function	Appointment Scheduling Tool, CRM, Customer Service, Email Provider, Human Resources, Marketing Tool, Office, Other Software Suite
Business process	Administration, Business Operations, Delivery of Goods and Services, Email, Marketing, Production of content, Software, Tools, and Applications, Storage of Digital Documents, Storage of Paper Documents, Website
Data categories	Business data, Contracts, Date of Birth, Financial, Health, Identification, Location, Photographs, Protected characteristics, Social Security Number, Software, Tools, and Applications, Technical data (e.g. source code), Video
Data subjects	Customers
Security measures	Physical security such as access controls, clean desk policy and CCTV; Access controls and prevention of unauthorised access on the basis of roles and strong authentication methods; All data is encrypted at rest and access is only permitted via encrypted channels (e.g. SSL); Data is minimized and regularly deleted according to national retention periods.

International data transfers

The third parties we have engaged for the abovementioned business process may transfer your personal information to outside of your jurisdiction. Health Tech Services Group Limited's third party processors take all necessary measures to ensure the confidentiality, availability and integrity of personal data and to comply with the GDPR with regards to international data transfers. The international nature of its compliance certifications, as well as far-reaching technical security measures (including but not limited to encryption of the personal data, making the data illegible to an unauthorised recipient) are sufficient to ensure that the data subjects continue to benefit from the fundamental rights they are entitled to under the GDPR.

Where Health Tech Services Group Limited transfers data to third countries, it relies on the following legal grounds for international data transfers:

- An Adequacy Decision in accordance with article 45 of the GDPR
- In the absence of an Adequacy Decision, appropriate safeguards in the form of Standard Contractual Clauses or Binding Corporate Rules.

In the event that Health Tech Services Group Limited is reliant on Standard Contractual Clauses for the legality of its international data transfer, it ensures that the Processor or Subprocessor takes supplementary security measures to safeguard the international data transfer with one or more of the following measures:

- Encryption;
- Anonymisation;
- Pseudonymisation.

Storage and protection of data

Your data is protected by Health Tech Services Group Limited and its processors in pursuance to all legal requirements set by the relevant data processing laws. Health Tech Services Group Limited has taken technical and organizational security measures to protect your data and requires its data processors to meet the same requirements. Health Tech Services Group Limited has signed processing agreements with its processors to ensure an adequate level of data protection.

The following security measures are taken by Health Tech Services Group Limited to protect your personal data in the course of the listed business processes:

Organisational security measures

Staff

Health Tech Services Group Limited staff members are required to conduct themselves in a manner consistent with Health Tech Services Group Limited's guidelines regarding confidentiality, business ethics, appropriate usage, and professional standards. All staff members undergo appropriate background checks prior to hiring and sign a confidentiality agreement outlining their responsibility in protecting customer data.

We continuously train staff members on best security practices, including how to identify social hacks, phishing scams, and hackers.

Access controls

Health Tech Services Group Limited maintains your data privacy by allowing only authorized individuals access to information when it is critical to complete tasks for you. Health Tech Services Group Limited staff members will not process customer data without authorization.

Data hosting

As a rule, data is hosted within countries and areas that provide a substantially similar level of protection as data subjects have under the GDPR. To ensure this, we rely on Adequacy Decisions as a legal basis for our international data transfers. In exceptional circumstances, where data is transferred to a country or area not subject to an Adequacy Decision, we rely on Standard Contractual Clauses with the recipient and take supplementary security measures to secure this data transfer, such as anonymisation.

Physical security

The data centres on which personal data is hosted are secured and monitored 24/7 and physical access to facilities is strictly limited to select staff.

Technical security measures

All devices which are used to access personal data for which we are responsible are secured with antivirus software, firewalls, encryption and access management. We regularly update operating systems and software to ensure vulnerabilities cannot be exploited.

We carry out regular vulnerability scanning of our website and have engaged credentialed external auditors to verify the adequacy of our security and privacy measures.

Your rights regarding information

Each data subject has the right to information on and access to, and rectification, erasure and restriction of processing of their personal data, as well as the right to object to the processing and the right to data

portability.You also have the right to request that you are not made subject to decision making based solely on automated processes, including profiling, if these decisions would have a significant effect on you.

You can exercise these rights by contacting us at the following email address: info@hts.group. If we have any doubts as to your identity, we may request you to provide us with proof of identification, such as through sending us a copy of your valid ID. Ensure that you write "Data Request" in the subject line of your email.

Within one month of the submitted request, you will receive an answer from us. We will not charge you for submitting your request unless the request is manifestly unfounded or otherwise unreasonable in its nature. Depending on the complexity and the number of the requests this period may be extended to two months.

Marketing

- You may receive commercial offers from Health Tech Services Group Limited. If you do not wish to receive them (anymore), please send us an email to the following address: info@hts.group and ensure that you write "Data Opt-Out" in the subject line of your email.
- Your personal data will not be used by our partners for commercial purposes.
- If you encounter any personal data from other data subjects while visiting our website, you are to refrain from collection, any unauthorized use or any other act that constitutes an infringement of the privacy of the data subject(s) in question. The collector is not responsible in these circumstances.

Data retention

The collected data are used and retained for the duration determined by law. You may, at any time, request your data to be deleted from any Health Tech Services Group Limited account, system or other data processing medium in accordance with the process described above.

Applicable law

These conditions are governed by the laws and regulations of the country where we are headquartered. The court in the district where we are headquartered has the sole jurisdiction if any dispute regarding these conditions may arise, save when a legal exception applies.

Children's Data

We do not knowingly process children's data, unless specifically stated in this Privacy Policy. If you have concerns about or knowledge of a child using our services, products, websites or apps without parental consent, please contact our DPO via support@naqcuber.com to ensure we can take appropriate action as soon as possible.

Contact

For questions about this privacy policy, product information or information about the website itself, please contact: info@hts.group.

International data transfers

Third Party Applications

Adobe

Third party headquarter address	345 Park Avenue San Jose, CA 95110-2704, United States of America
The primary location of processing is the United States of America.	Personal data collected by Adobe may be stored and processed in any country where Adobe or its affiliates, subsidiaries, or service providers operate facilities.
Safeguards (art. 45 GDPR)	Adequacy decision exists between United Kingdom and United States of America
Additional safeguards	- Encryption - Anonymisation where possible - Pseudonymisation where possible
For more information, see Adobe's Privacy Policy	https://www.adobe.com/privacy.html

Zoho

Third party headquarter address	Beneluxlaan 4B, 3527 HT Utrecht, Nederland, The Netherlands
The primary location of processing is the The Netherlands.	Personal data collected by Zoho may be stored and processed in any country where Zoho or its affiliates, subsidiaries, or service providers operate facilities.
Safeguards (art. 45 GDPR)	Adequacy decision exists between United Kingdom and The Netherlands
Additional safeguards	• Encryption • Anonymisation where possible • Pseudonymisation where possible
For more information, see Zoho's Privacy Policy	https://www.zoho.com/privacy.html

Suppliers