

1 Purpose

De Soutter Medical acts as a “Data Processor”, which means we are responsible for processing personal information about you on behalf of your hospital or healthcare provider.

You are receiving this privacy notice because De Soutter Medical collects and processes certain personal data about you. This notice explains:

- How and why your personal data will be used
- How and why it may be shared
- How long it will usually be retained

It also provides you with certain information that must be provided under the UK Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

We may amend this Notice from time to time and will inform you in advance of any significant changes.

2 Identity of the Data Controller

De Soutter Medical Limited, Registered in England and Wales under company number 03164365, Registered office: Halton Brook Business Park, Aston Clinton, HP22 5WF

3 How is your personal information sourced?

Personal data may be collected directly from you, through our website, at events or exhibitions, via enquiry forms, or through your ongoing relationship with us.

4 Information we hold about you

We will collect, store, and use the following categories of personal information about you as set out in the table below.

Categories of Personal Data	Purpose of Processing	Lawful Basis
Phone number, Email address, Company, Job title,	To effectively communicate with you	Legitimate Interest
Survey Responses	Customer Services, improvement of our products and services	Legitimate Interest
IP Address, Cookies	To analyse website usage and improve website functionality	Legitimate Interest
Postal Address	To supply products and services	Legitimate Interest
Records of conversation, purchase history (commercial)	To manage your account	Legitimate Interest

You are not required to provide your personal information by law, but without it we may be unable to provide services effectively.

For Processing Personal Data on behalf of Healthcare Providers for provision of our Celito product, please see our “Celito Patients Privacy Notice”.

N.B. We may need to process data as necessary in connection with any legal claims or prospective legal claims. (Schedule 1, Part 3, paragraph 33 of DPA.)

5 Tracking & Cookies Data

We use cookies and tracking technologies to improve functionality and analyse website usage.

Examples include session cookies, preference cookies, and security cookies.

6 Data sharing: intra-group and third-party recipients

To deliver our services effectively, we sometimes need to share your personal information with trusted third parties. Any third-party processors used by us will be bound by Data Processing Agreements.

7 Data Security and Breach Notification

We have implemented robust security measures to protect your personal information from accidental loss, unauthorised access, misuse, alteration, or disclosure. Access to your personal data is strictly limited to employees who need it. #

We also have procedures in place to respond to any suspected data security breaches. If a breach occurs and we are legally required to do so, we will notify the Information Commissioner’s Office, and you.

8 Data Retention

How long will you use my information for?

We will keep your personal information for as long as necessary to support your care and to meet our legal and contractual obligations. The exact retention period depends on the type of information, the system used, and dependent on the retention requirements. Once the relevant retention period expires, your data is securely deleted in line with strict retention schedules.

8. Your Rights Regarding your Personal Information

Under data protection law, you have certain rights in relation to your personal information. These rights may apply in specific circumstances and include the following:

Right of Access: You can request a copy of the personal information we hold about you and check that we are processing it lawfully.

Right to Correction: You can ask us to correct any incomplete or inaccurate information we hold about you.

Right to Erasure: You can ask us to delete or remove your personal information where there is no good reason for us to continue processing it. You may also request erasure if you have objected to our processing (see below).

Right to Object: You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party), if there is something about your particular situation which makes you want to object.

Right to Restrict Processing: You can ask us to suspend the processing of your personal information, for example, if you want us to confirm its accuracy or the reason for processing it.

Right to Data Portability: You can request the transfer of your personal information to another party.

Right to Complain: If you are concerned about how your personal information is being handled by De Soutter Medical, you have the right to make a complaint to our Data Protection Officer. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Note: If you wish to review, verify, correct, request erasure, object to the processing, or request the transfer of your personal information, please contact the Data Protection Officer (DPO) for your hospital or healthcare provider in the first instance.

9 Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO via dpo@de-soutter.com

10 Document History

Version	Date	Amended By	Owner	Description of Change
1	02.2026	R Mannix	DPO	Updated throughout