



Salusphere Global Ltd Customer Privacy Notice

Registered name: Salusphere Global Ltd

We are the controller of your personal data. For more information on controllers and their responsibilities please see our guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Post: 124 City Road, London, EC1V 2NX

Telephone: 0330 122 7179

Email: info@salusphereglobal.com

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery**:

- Names and contact details
- Addresses
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Health and safety information
- Website user information (including user journeys and cookie tracking)
- Records of meetings and decisions
- Information relating to compliments or complaints

We collect or use the following information for **the operation of customer accounts and guarantees**:

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- IP addresses
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following information to **comply with legal requirements**:

- Name
- Contact information
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access](#).
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification](#).
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure](#).
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](#).

- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in using personal information to provide, manage and improve our services, respond to enquiries, maintain accurate business records, support client relationships, manage appointments and communications, and ensure our services are delivered safely and effectively. We only use the information that is necessary for these purposes and balance our business needs against the rights, freedoms and expectations of the individuals involved.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in managing client and customer accounts, keeping accurate records of services provided, maintaining communication history, handling account administration, supporting service continuity, preventing errors or duplication, and managing our normal business relationship with clients and customers. We only use information that is necessary for these purposes and take account of the rights and expectations of the individuals involved.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in keeping clients, prospective clients and relevant business contacts informed about services, updates, resources and events that may be relevant to their organisation or role. We only send marketing where it is appropriate to do so, give people a clear way to opt out, and balance our business interest against the rights, freedoms and expectations of the individuals involved.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in keeping appropriate records to demonstrate compliance, manage risk, respond to regulatory or legal queries, protect our business, clients and workers, and support safe and lawful service delivery. We only use the information necessary for these purposes and balance our interests against the rights and expectations of the individuals involved.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in responding to enquiries, managing complaints or claims, keeping appropriate records, investigating issues, resolving disputes, protecting our business, clients and workers, and improving our services. We only use information that is relevant and necessary for these purposes and balance our interests against the rights and expectations of the individuals involved.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you

- Publicly available sources
- Providers of marketing lists and other personal information
- Suppliers and service providers

How long we keep information

We only keep personal information for as long as necessary for the purposes we collected it for, including providing services, managing client relationships, meeting legal, accounting and reporting requirements, handling complaints or claims, and maintaining appropriate business records.

Client, supplier and financial records are normally kept for up to 7 years after the end of the relevant relationship or transaction, unless a longer period is required because of a legal, regulatory, insurance, contractual or dispute-related reason.

Enquiry and prospect information is normally kept for up to 2 years after the last meaningful contact, unless you become a client or ask us to delete it sooner.

Marketing preference information may be kept for as long as needed to respect your choices, including records of unsubscribes or objections.

Training, attendance and certification records may be kept for as long as needed to evidence training delivered, meet awarding body requirements, support certification, or respond to reasonable queries.

When personal information is no longer needed, we will delete it, anonymise it or securely archive it where appropriate.

Who we share information with

Data processors

IT, website, email, cloud storage, accounting, payment, training platform and certification providers used by Salusphere Global.

This data processor does the following activities for us: These providers help us operate our business systems, manage email and website services, store business records, process payments and invoices, support online training delivery, manage learner or client records where relevant, and issue or support training certification where applicable.

Others we share personal information with

- Professional or legal advisors
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with

Sharing information outside the UK

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

Organisation name: Google Ireland Limited

Category of recipient: Cloud storage, email and business productivity services provider

Country the personal information is sent to: Ireland, European Economic Area and other countries where Google or its sub-processors process data

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: info@salusphereglobal.com

Telephone: 0330 122 7179

Post: 124 City Road, London, EC1V 2NX

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>