

## Privacy statement

This privacy policy tells you how we use personal information collected in the HES Benchmarking service. Please read this privacy policy before using the site or submitting any personal information. By using the site, you are accepting the practices described in this privacy policy. These practices may be changed, but any changes will be posted and changes will only apply to activities and information on a going forward, not retroactive basis. You are encouraged to review the privacy policy whenever you visit the site to make sure that you understand how any personal information you provide will be used.

Note: the privacy practices set forth in this privacy policy are for this website only. If you link to other websites, please review the privacy policies posted at those sites.

### Collection of Information

We collect personally identifiable information, including your name, email address and organisation name, when voluntarily provided by you. Your organisation and email address is required as we limit the use of this service to authorised organisations in adherence with our agreement with NHS Digital. We also monitor, collect and analyse usage statistics on an aggregated basis, to enable us to improve the service going forward.

### How we use your data

The information you provide is used to personalise your experience within the software, and to enable us to contact you in relation to your use of the software according to the preferences you specify.

We would like to email you with updates each time the alerts are refreshed, or when new functionality is added to the service. You can opt in or out of this at any time by updating your preferences in the “Edit Contact” screen.

CSL may from time to time like to contact you to inform you of other services we offer that may be of interest. You may opt in or out of this at any time through the “Edit Contact” screen.

### Legal basis for processing your data

The data you provided on subscription are collected and held to enable us to provide you with the HES Benchmarking Service, with the fulfilment of contract as legal basis for processing.

Updates on the service or other related services are provided under the legal basis of consent where you have opted in.

### Data retention

We will store your data for the period of your subscription, and will remove your personal data from our systems immediately upon your unsubscribing.

### Unsubscribing

To unsubscribe from the service, log in and click on the profile icon in the top right. Choose “Edit Account” and then unsubscribe.

## Your rights

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us using the Privacy Contact Information below.

If you no longer wish to receive information such as newsletters from us, you can unsubscribe by emailing "unsubscribe" to [info@csl-uk.com](mailto:info@csl-uk.com) from the relevant email address.

### How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so, being sure to name the service it is regarding (e.g HES Benchmarking Service).

If you withdraw your consent, we will not be able to continue to provide you with the service once your data has been erased.

### How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us using the Privacy Contact Information below.

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern, <https://ico.org.uk/>.

## Cookie/Tracking Technology

The Site may use cookie and tracking technology depending on the features offered. Cookie and tracking technology are useful for gathering information such as browser type and operating system, tracking the number of visitors to the Site, and understanding how visitors use the Site. Cookies can also help customise the Site for visitors. Personal information cannot be collected via cookies and other tracking technology, however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.

### Categories of data processed

We only require identifying data, to enable us to provide you with appropriate data through the site, and to ensure you are entitled to see the data according to the limitations imposed on us by NHS Digital.

### Location of processing

All data is stored and processed within the UK.

### Distribution of Information

We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when: (1) permitted or required by law; or, (2) trying to protect against or prevent actual or potential fraud or unauthorised transactions; or, (3) investigating fraud which has already taken place. The information is not provided to these companies for marketing purposes.

### Commitment to Data Security

Your personally identifiable information is kept secure. Only authorised employees, agents and contractors (who have agreed to keep information secure and confidential) have access to this information.

We take data security very seriously, and are ISO27001 certified.

### Privacy Contact Information

If you have any questions, concerns, or comments about our privacy policy you may contact us (the data controller) using the information below:

By email: [info@csl-uk.com](mailto:info@csl-uk.com)

By Phone: ++44 (0) 1483 528 300

By Mail: Data Protection Officer, CSL, The Sussex Barn, Peper Harow Park, Godalming, Surrey, GU8 6BQ

We reserve the right to make changes to this policy. Any changes to this policy will be posted.

**Last reviewed 22<sup>nd</sup> June 2021**