



CineMedics UK Ltd.  
c/o CLINTONS  
55 Drury Lane  
London WC2B 5RZ  
United Kingdom  
[GDPR@cinemedics.us](mailto:GDPR@cinemedics.us)

**Key terms:**

**We, us, our** - CineMedics UK Ltd. is a data controller under the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

CineMedics UK Ltd. is registered in England with company number 13658787.

**Data Protection Officer** - Mark Helmer

**Personal data** - Any information relating to an identified or identifiable individual

**Special category personal data** - Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership. Genetic and biometric data (when processed to uniquely identify an individual). Data concerning health, medical records, sex life or sexual orientation

**Your Rights:**

- *Access*
  - The right to be provided with a copy of your personal data
- *Rectification*
  - The right to require us to correct any mistakes in your personal data
- *Erasure (AKA 'The Right to be Forgotten')*
  - The right to require us to delete your personal data—in certain situations
- *Restriction of Processing*
  - The right to require us to restrict processing of your personal data in certain circumstances (e.g. if you contest the accuracy of the data)



- *Data Portability*
  - The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party — in certain situations
  
- *To Object*
  - The right to object: at any time to your personal data being processed for direct marketing (including profiling); in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.
  
- *Not to be subject to automated individual decision making*
  - The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

### **How We Collect Information About You:**

CineMedics UK Ltd. and its employees and volunteers collect data through a variety of means including but not necessarily limited to:

- Letters, phone calls, emails, voicemails, and from the submission of applications that are either required by law or necessary to process applications or other requests for assistance through our organization.
- From publicly accessible sources, e.g. Companies House or HM Land Registry;
- Directly from a third party, such as your employer;
- Where relevant via Covid-19 swab testing as required by current best practice guidelines on set and by Public Health England.

### **What We Collect**

We may collect and use the following personal data about you:

- Your name and contact information, including email address and telephone number and company details;
- Information to check and verify your identity, e.g. your date of birth;
- Your gender, health and location data;
- Information about how you use our website, IT, communication and other systems;
- Your billing information, transaction and payment card information;



- Your responses to surveys, competitions, and promotions;
- Required information regarding your Covid-19 symptoms and the result of on-set Covid-19 swab tests.

We collect and use this personal data to provide services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

**What We Do Not Do With Your Information:**

Information about your financial situation and medical conditions and care that you provide to us in writing, via email, on the phone (including information left on voicemails), contained in or attached to applications, or directly or indirectly given to us, is held in strictest confidence. We do not give out, exchange, barter, rent, sell, lend, or disseminate any information about applicants or clients who apply for or actually receive our services that are considered patient confidential, restricted by law, or specifically restricted by a patient/client in a signed consent form.

**How We Do Use Your Information:**

Information is only used as is reasonably necessary to process your application or to provide you with health or counseling services which may require communication between CineMedics UK Ltd., CineMedics CNY LLC, contractors or joint venture partners, health care providers, medical product or service providers, pharmacies, insurance companies, and other providers necessary to verify your medical information is accurate and determine the type of medical supplies or health care services you need. This is including, but not limited to, to obtain or purchase any type of medical supplies, devices, medications, or insurance (when applicable).

In relation to Covid-19, test results will be shared with our third-party client requiring your test and to your employer. Positive test results will be notified to Public Health pursuant to The Health Protection (Notification) Regulations 2010 (the 2010 Regulations) as amended.

If you apply or attempt to apply to receive assistance through us and provide information with the intent or purpose of fraud or that results in either an actual crime of fraud for any reason including willful or un-willful acts of negligence whether intended or not, or in any way demonstrates or indicates attempted fraud, your non-medical information can be given to legal authorities including police, investigators, courts, and/or attorneys or other legal professionals, as well as any other information as permitted by law.



### **What we use your personal data for:**

- To perform our contract with you or to take steps at your request before entering into a contract.
- Preventing and detecting fraud against you or us: For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us
- Conducting checks to identify our customers and verify their identity To comply with our legal and regulatory obligations Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator: To comply with our legal and regulatory obligations
- Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies: To comply with our legal and regulatory obligations
- Ensuring business policies are adhered to, e.g. policies covering security and internet use: For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
- Operational reasons, such as improving efficiency, training and quality control: For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
- Ensuring the confidentiality of commercially sensitive information: For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information. To comply with our legal and regulatory obligations
- Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures: For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
- Preventing unauthorised access and modifications to systems: For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for you and/or us. To comply with our legal and regulator obligations
- Updating and enhancing customer records: To perform our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
- Statutory returns: To comply with our legal and regulatory obligations.



- Ensuring safe working practices, staff administration and assessments: To comply with our legal and regulatory obligations. For our legitimate interests or those of a third party (e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you)

**Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:**

- We have your explicit consent;
- The processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- The processing is necessary to establish, exercise or defend legal claims.

**Keeping your personal data secure:**

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where possible our data is anonymised before any transmission, such as through the use of bar codes and data anonymising precautions. All patient data obtained in the carrying out of testing is retained securely and confidentially in accordance with the Data Protection Legislation.

**How long your personal data will be kept:**

We will keep your personal data while you have an account with us or we are providing services to you. Thereafter, we will keep your personal data for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly;
- To keep records required by law.



We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data. When it is no longer necessary to keep your personal data, we will delete or anonymise it.

**Where your personal data is held:**

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above in 'How We Do Use Your Information'

**Transferring your personal data out of the UK:**

To deliver services to you, it is sometimes necessary for us to share your personal data outside the UK/EEA (e.g. Our parent company is based in the United States):

- Where there is a European and/or international dimension to the services we are providing to you.
- With your and our service providers located outside the UK;
- If you are based outside the UK;

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK where:

- The UK government has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
- There are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- A specific exception applies under data protection law

**Adequacy Decision:**

We may transfer your personal data to certain countries, on the basis of an adequacy decision.

These include:

- European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');



The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

#### **Transfers with appropriate safeguards:**

Where there is no adequacy decision, we may transfer your personal data to another country or international organisation if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using legally-approved standard data protection contract clauses. To obtain a copy of the standard data protection contract clauses and further information about relevant safeguards please contact us (see 'How to contact us' below).

#### **Transfers under an exception:**

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under relevant data protection law, e.g.:

- You have explicitly consented to the proposed transfer after having been informed of the possible risks;
- The transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
- The transfer is necessary for a contract in your interests, between us and another person; or
- The transfer is necessary to establish, exercise or defend legal claims.



We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

**How to access your personal information:**

You may make a request for personal data that we hold about you and about your other data protection rights

Requests may be made in writing, by email or by speaking to us. You may need to provide information to verify your identity and enable us to locate the information.

You may be asked to provide:

- Full name, address, date of birth, phone number, date of care, name of project (if applicable)
- An indication of what information you are requesting to enable us to locate this in an efficient manner.

**How to complain:**

Please contact us if you have any query or concern about our use of your information (see below 'How to contact us'). We hope we will be able to resolve any issues you may have. You also have the right to lodge a complaint with the Information Commissioner or any relevant European data protection supervisory authority. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

**How to contact us**

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information, we hold about you, to exercise a right under data protection law, or to make a complaint.

**Contact details of our Data Protection Officer:**

If you have any queries about this privacy notice or about how CineMedics UK Ltd. processes personal data please contact our data protection officer at the address below.



- **Mark Helmer, Data Protection Officer**
- **In writing:**
  - CineMedics UK Ltd.
  - c/o CLINTONS
  - attn: GDPR DPO
  - 55 Drury Lane
  - London WC2B 5RZ
  - United Kingdom
- **Email:** mark@CineMedics.us
- **Phone:** 1 315 378 8880

### **Changes to this privacy policy**

We may change this privacy notice from time to time—when we do, we will inform you via our website or email.