

Crystal Health Group

Privacy Policy

 CRYSTAL Health Group	Document name	Version
	Client Privacy Policy	v10.01.25

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1. Purpose

We are committed to safeguarding the privacy of our clients and customers. This policy applies where we are acting as a data controller with respect to the personal data of our clients and customers; in other words, where we determine the purposes and means of the processing of that personal data. We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

In this policy, “we”, “us” and “our” refer to Crystal Health Group Limited (company number: 10804496) with a registered office address at 300 St Mary’s Road, Garston, Liverpool, England, L19 0NQ, You can contact us on 0800 988 7107 or at info@crystal-health.co.uk. Our postal address is The Old Chapel, Manchester, M30 0NG.

2. Scope

This privacy policy relates to all clients and customers of Crystal Health Group Limited and the processing by Crystal Health Group Limited of their personal data.

3. Responsible Person(s)

The Policy Author is responsible for:

- Accuracy, version control and review dates.
- Implementation, training and operational compliance of this Policy.
- Initiating Policy change requests.

The QA representative is responsible for:

- Ensuring adherence to company Policy standards for authoring, content and structure.
- Resolution of Quality Incident reports arising from noncompliance of this Policy or external complaints.

Trained personnel are responsible for complying with all aspects of this Policy.

4. Health & Safety

All tasks and activities associated with this Policy comply with Crystal Health Group’s Health & Safety Policy.

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5.1 Policy

5.1 More information as to how we use your personal data

In this Policy, we have set out:

1. the general categories of personal data that we may process;
2. in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
3. the purposes for which we may process personal data; and
4. the legal bases of the processing.

5.2 How is your personal data collected

We use different methods to collect data from and about you including through:

1. **Your interactions with us:** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: (a) apply for and we provided our testing services; (b) create an account with us or request credit; (c) request marketing to be sent to you; or (d) give us feedback or contact us.
2. **Automated technologies or interactions:** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
3. **Third parties or publicly available sources:** We will receive personal data about you from various third parties; including (a) our sample collectors; (b) analytics providers such as Google based outside the UK; (c) advertising networks; and (d) search information providers; (d) providers of technical, payment and delivery services.

5.3 Legal basis for processing your personal data

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

1. **Performance of a contract with you:** Where we need to perform the contract, we are about to enter into or have entered into with you.
2. **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests; for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
3. **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. Where reasonably practicable, we will use reasonable endeavours to identify the relevant legal obligation when we rely on this legal basis.
4. **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose; for example, if we provide any testing services to you, you subscribe to an email newsletter or to process your sample.

In addition, we can only process more sensitive 'special category' data where specific conditions are met. For more information on what constitutes special category data, please see section below. We will rely on the following specific condition when processing special category data:

5. **Explicit Consent:** When relying on your consent, such consent must be freely given and confirmed in a clear statement (opt-in) from you. Therefore, on the occasions where we ask you for consent to our processing of your special category data, we will always tell you what type special category data we will be processing, as well as why how that information will be used. This may be obtained through a separate consent form, specific to the nature of special category data we will be processing.

Where we process your special category data in reliance on explicit consent we have obtained from you, you can withdraw such consent at any time. Please refer below for further information on your rights on withdrawing consent.

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Please note that in the event your consent is withdrawn in respect of processing of your special category data, we may not be able to fulfil or conclude any services we have agreed to provide for which processing of such special category data is required.

5.4 Usage Data

We may process data about your use of our website and services. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics, Google Search Console, Shopify ecommerce platform and website plug-ins.

This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

Account Data

We may process your account data. The account data may include your name and email address telephone number, mobile number and home or work address.

The source of the account data is you, your employer or authorised third party representative or agent.

The account data may be processed for the purposes of providing our services, ensuring the security of our services, maintaining back-ups of our databases and communicating with you.

The legal basis for this processing is consent, our legitimate interests, namely the proper administration of our business or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Service Data

We may process your personal data that are provided in the course of the use of our services. The service data may include but not limited to:

- Names of individuals
- Dates of birth
- Telephone numbers
- Email addresses
- Postal addresses
- Passport numbers
- Driver numbers
- National Insurance numbers
- Other forms of identification and associated numbers
- Payment details

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Data concerning health
- Current medication
- Genetic data
- Racial or ethnic origin

More information on how special category data is defined by the Information Commissioner’s Office can be found through the following link:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/special-category-data/>

The source of the service data is you, your employer or authorised third party representative or agent.

The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent, our legitimate interests, namely the proper administration of our website and business or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Special category data is collected via means of version controlled documentation by employees of Crystal Health

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Group Limited or approved and authorised contractors. At this point, written explicit consent is obtained by you to fulfil any testing service requested.

Please refer to section below for your rights on withdrawing consent.

Publication Data

We may process information that you post for publication on our website or through our services e.g. client feedback, surveys or testimonials. The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Enquiry Data

We may process information contained in any enquiry you submit to us regarding services. The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you.

The legal basis for this processing is consent or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Refer to call recording below.

Transaction Data

We may process information relating to transactions, including purchases of services, that you enter into with us. The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions.

The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

Correspondence Data

We may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. Refer to call recording below.

Call recording

The law provides that businesses can record calls without consent for the following purposes:

- To record evidence of business exchanges
- To review whether quality standards are being met
- To ensure a business complies with regulations
- To prevent and detect criminal activity
- To investigate the suspicious use of a network

All calls at Crystal Health Group are recorded for quality purposes. You will be informed of this during all calls you make to us. If payment details are provided during a call, our representative will pause the call to ensure no card details are recorded and therefore not stored. Call recordings can only be accessed by authorised personnel at Crystal Health Group. In addition, recorded calls form part of the Subject Access Request and Right to Erasure process.

Other Data

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining

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or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks. In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary, for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

5.5 Providing your personal data to others

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out of court procedure.

You consent and agree that we may disclose service data to our suppliers or subcontractors; currently being Matrix, Cansford, Alpha, Anglia, Eurofins, Synlab, Express Medicals, Healthwork or Medigold (Hampton Knight) (as varied from time to time) insofar as reasonably necessary to fulfil the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Financial transactions relating to our website and services are handled by our payment services providers, Worldpay, American Express, PayPal and Shopify payments.

We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at:

<https://www.worldpay.com/uk/privacy-policy>, <https://www.americanexpress.com/en-gb/company/legal/privacy-centre/privacy-principles/>, <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev> and <https://www.shopify.com/uk/legal/terms-payments-gb>

In addition to the specific disclosures of personal data set out in this section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. In specific circumstances, you may also grant third party consent. This will provide authorisation for us to share your personal data with your nominated third party.

Please refer to the Third-Party Consent diagram at the end of this policy for detailed information regarding the request process. In addition, please refer to specific consent terms and conditions for your chosen test. This must be read and understood when signing consent to proceed with our services.

5.6 International transfers of your personal data

In this section, we provide information about the circumstances in which your personal data may be transferred to countries outside the United Kingdom.

We have offices and facilities in the United Kingdom.

The hosting facilities for our website and servers are situated in the United Kingdom and Ireland.

You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet. We cannot prevent the use (or misuse) of such personal data by others.

5.7. Retaining and deleting personal data

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

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Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. All retention times for all Crystal Health Group services are detailed in our archive policy. Please call 0800 988 7107 to request details regarding retention times for your specific test with Crystal Health Group. Retention times comply with The Human Tissue Act and all other applicable laws and industry specific guidelines.

Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5.8 Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy. We may notify you of changes to this policy, from time to time, and any updates will be available on our website.

5.9 Your rights

In this section, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law are:

1. **the right to access** - this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
2. **the right to correction** - this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us (please see further details below). You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed;
3. **the right to erasure** - this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (please refer to the Archive Policy for restrictions on this).
- you withdraw consent to consent-based processing; (administration fees may apply)
- you object to the processing under certain rules of applicable data protection law;
- the processing is for direct marketing purposes;
- the personal data have been unlawfully processed.

However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary:

- for compliance with a legal obligation (specifically a court order requesting the test).
- for the establishment, exercise or defence of legal claims.

You can apply for the right to erase your data by downloading and completing the Right to Erasure Request / Sample Destruction form. The following times-scales will apply for your application:

- Confirmation of receipt - within 2 working days of receiving your application.
- Review of your application by our Data Protection Officer (DPO) - up to 5 working days.
- You will receive a notification of the decision from our DPO regarding your application.
- If your application is accepted, we will confirm erasure of your data / destruction of samples (if applicable) within 30 calendar days of your original request date;

4. **the right to restrict processing** - this enables you to ask us to suspend the processing of your personal data in one of the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the

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data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances include:

- you contest the accuracy of the personal data;
- processing is unlawful but you oppose erasure;
- we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims;
- you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it:
 1. with your consent;
 2. for the establishment, exercise or defence of legal claims;
- for the protection of the rights of another natural or legal person; or for reasons of important public interest;

5. the right to object to processing – this is applicable where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is:

1. consent; or
2. that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract;

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection;

- 6. the right to request the transfer** - we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- 7. the right to complain to a supervisory authority** – further details on how you might do this are set out below; and
- 8. the right to withdraw consent** - withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you

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withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

To withdraw your consent, you must inform Crystal Health Group as soon as possible on 0800 988 7107 or 0161 359 4187. You will then be instructed to provide a written request to officially withdraw your consent. You may be asked to supply appropriate evidence of your identity before the request can be processed. In addition, further authorisation from your solicitor or employer may have to be obtained.

If you wish to exercise any of the rights set out above, please contact us possible on 0800 988 7107 or 0161 359 4187.

In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary, for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. Please do not supply any other person's personal data to us, unless we prompt you to do so.

5.10 Additional rights and protections which we provide

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information.

That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. We may charge you an admin fee if we deem that any request is unreasonable, or you make numerous requests for the same data subject or set of personal data.

You can access your personal data by downloading and completing the subject access request form. We will comply with your subject access request within 30 days.

FAO: Quality Assurance
Crystal Health Group
The Old Chapel
53 Peel Street
Manchester M30 0NG

5.11 About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies that we use

We use cookies for the following purposes:

- Authentication - we use cookies to identify you when you visit our website and as you navigate our website.
- Analysis - we use cookies to help us to analyse the use and performance of our website and services. See ‘Cookies used by our service providers’ below.
- Cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our website. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: <https://www.google.com/policies/privacy/>.

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Some cookies and similar technologies help sites and apps understand how their visitors engage with their services. For example, Google Analytics uses a set of cookies to collect information on behalf of businesses which use the Google Analytics service and report site usage statistics to them without personally identifying individual visitors. ‘_ga’, the main cookie used by Google Analytics, enables the service to distinguish one visitor from another and lasts for 2 years. Any site that implements Google Analytics, including Google services, uses the ‘_ga’ cookie. Each ‘_ga’ cookie is unique to the specific property, so it cannot be used to track a given user or browser across unrelated websites.

Google services also use ‘NID’ and ‘_Secure-ENID’ cookies on Google Search, and ‘VISITOR_INFO1_LIVE’ and ‘__Secure-YEC’ cookies on YouTube, for analytics. Google mobile apps may also use unique identifiers, such as the ‘Google Usage ID’, for analytics.

Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

5.12 Our details

Crystal Health Group Limited is registered in England and Wales under registration number 10804496, and our registered office is at 298 St. Mary’s Road, Garston, Liverpool, Merseyside L19 0NQ.

Crystal Health Group Limited is registered under the Data Protection Act 1998 Registration No. ZA260675. Our principal place of business is at The Old Chapel, 53 Peel Street, Manchester M30 0NG.

You can contact us:

- by post, to the postal address given above;
- using our website contact form;
- by telephone, on 0800 988 7107 / 0161 359 4187; or
- by email, using info@crystal-health.co.uk

5.13 Data protection officer

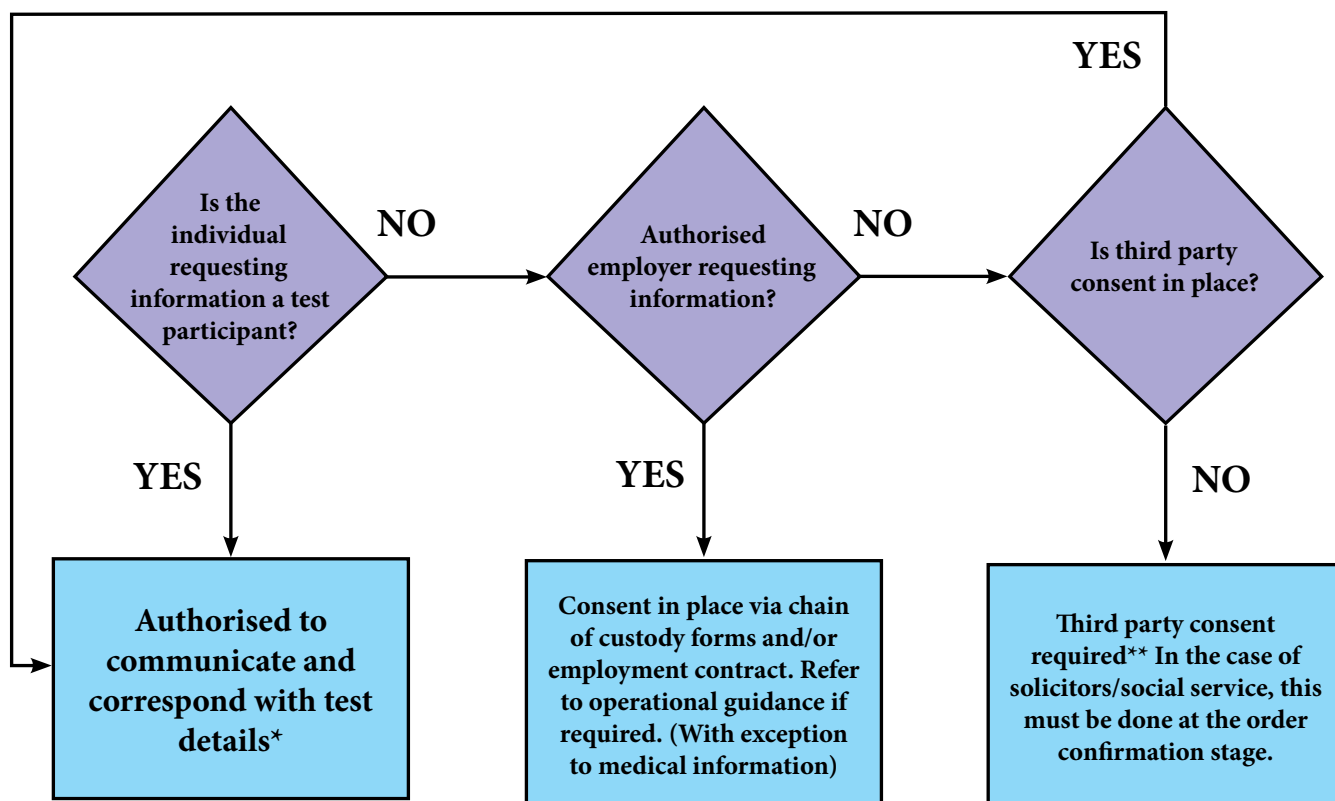
Our data protection officer’s contact details are:

FAO: Data Protection Officer
Crystal Health Group
The Old Chapel
53 Peel Street
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5.14 Third Party Consent

The process diagram illustrates the procedure for obtaining third party consent for Crystal Health Group test cases.



*** Dependant on providing correct responses to security questions.**

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6. Version Control

It is the responsibility of each person to ensure they adhere to this policy. It is the responsibility of the Operations Manager to maintain and implement this policy.

Previous Version	Changes	Last Effective Date
v09.08.23	- Change of title to Privacy Policy. - Complete professional review by commercial solicitor to comply with current legislation.	13/01/2025
v08.06.23	- Addition of call recording to section 5.1. - Addition to suppliers in section 5.2	22/08/2023
v07.06.22	- Update to 3rd party consent flow. - Addition to suppliers in section 5.2 - Addition of payment provider in section 5.2	21/06/2023
v06.06.21	- Addition of supplier in section 5.2 - Update to both SAQ and RTE web urls	30/06/2022
v05.04.21	Update to Third Party Consent process flow.	02/06/2021
v04.11.19	- Addition of reference to consent terms and conditions for specific tests in section 5.2 - Removal and addition of supplier names in section 5.2	30/04/2021
v.03.04.19	- Inclusion of special category data in service data section in 5.1 - Inclusion of Right to Erasure form and time-scales in 5.6	27/11/2019
v.02.04.18	Addition of suppliers and contractors to section 5.4 Retaining and deleting personal data.	09/04/2019
v.01.06.17	Complete review and update to comply with GDPR requirements.	27/04/2018

7. Authorisation

Name John McChrystal Position Director

Signed 

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