

Crystal Health Group Policy

Privacy Policy

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	Privacy Policy	v12.08.26

1. Purpose

Crystal Health Group is committed to protecting personal data and respecting the privacy rights of individuals whose information we process.

This policy explains how Crystal Health Group collects, uses, shares, stores and protects personal data, the lawful bases on which we process it and the rights available to individuals under applicable data protection law.

In this policy, “we”, “us” and “our” refer to Crystal Health Group Limited (company number 10804496), whose registered office is at 300 St Mary’s Road, Garston, Liverpool, England, L19 0NQ. You can contact us by telephone on 0800 988 7107, by email at info@crystal-health.co.uk or by post at The Old Chapel, 53 Peel Street, Eccles, Manchester M30 0NG.

2. Scope

This policy applies to personal data processed by Crystal Health Group in connection with its services and business activities. This includes information relating to:

- Clients, including those referred by employers, solicitors or other authorised organisations.
- Prospective clients and people making enquiries.
- Website users.
- Supplier and other business contacts.

Crystal Health Group may act as either a Data Controller or a Data Processor, depending on the particular processing activity:

- We act as a Data Controller where we determine why and how personal data is processed, including in relation to our websites, enquiries, client accounts, transactions, communications and the administration of our business.
- We act as a Data Processor where we process personal data solely on the documented instructions of a client acting as the Data Controller.
- Certain laboratories, occupational health providers and other professional service providers may act as separate Data Controllers where they determine how personal data or clinical records are processed in accordance with their own legal, regulatory or professional obligations.

The respective responsibilities of Crystal Health Group, its clients and its service providers depend on the nature of the service and the specific processing activity involved.

3. Responsibilities

- **Company Directors** – approve this policy, ensure appropriate data protection arrangements are maintained and provide adequate resources to meet the organisation’s legal obligations.
- **Data Protection Officer** – oversees data protection compliance, provides advice and guidance, and coordinates the handling of individual rights requests, data protection complaints and personal data breaches.
- **Policy Author and Quality Assurance representative** – maintain the accuracy and version control of this policy, initiate necessary updates and monitor its implementation and operational compliance.

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- **Employees and contractors** – comply with this policy, complete appropriate training, protect personal data and promptly report any suspected loss, misuse or unauthorised disclosure.

4. Policy

This section explains how Crystal Health Group obtains and processes personal data, including the lawful bases on which it relies when acting as a Data Controller.

Where Crystal Health Group acts as a Data Processor, the relevant client acting as the Data Controller is responsible for determining and documenting the applicable lawful basis. Crystal Health Group processes that personal data only in accordance with the client's documented instructions and applicable data protection law.

4.1 How We Collect Personal Data

We collect personal data through the following methods:

- **Directly from you** – including when you complete forms or testing documentation, provide a sample, communicate with us by telephone, email or post, use our websites, make a payment, provide feedback or otherwise use our services. Information may also be collected directly from you by an approved sample collector, clinician or contractor acting in connection with the service.
- **From clients and authorised third parties** – including employers, solicitors, representatives or other authorised organisations that instruct us or provide information necessary for us to deliver a service.
- **From service providers** – including laboratories, occupational health providers, payment providers, delivery providers and other organisations involved in delivering or supporting the requested service.
- **Through automated technologies** – when you use our websites, we may automatically collect technical information about your device, browsing activity and usage patterns through cookies, server logs and similar technologies. Further information about our use of cookies and similar technologies is provided in section 4.10 of this policy and through the cookie settings available on the relevant website.

4.2 Lawful Bases for Processing Personal Data

When Crystal Health Group acts as a Data Controller, we will only process personal data where we have a lawful basis to do so. Depending on the circumstances, we may rely on one or more of the following:

- **Performance of a contract** – where processing is necessary to enter into or perform a contract with you.
- **Legitimate interests** – where processing is necessary for the proper administration, security and operation of our business, the prevention of fraud, the management of enquiries and communications, or the establishment, exercise or defence of legal rights. Before relying on legitimate interests, we consider whether those interests are overridden by your rights and freedoms.
- **Legal obligation** – where processing is necessary for us to comply with a legal or regulatory obligation.

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- **Consent** – where you have actively agreed to the processing of your personal data for a specified purpose.
- **Vital interests** – in exceptional circumstances, where processing is necessary to protect your life or the life of another person.

Some of the services we provide involve special-category data, including health or genetic information. Where Crystal Health Group acts as a Data Controller, we will only process special-category data where both a lawful basis and an additional condition under data protection law apply.

Where we rely on explicit consent, we will explain what special-category data will be processed, why it is required and how it will be used. Consent will be obtained through an appropriate consent form or other clear affirmative action.

Special-category data may also be processed where necessary for the establishment, exercise or defence of legal claims. Where a laboratory, occupational health provider or other professional service provider acts as a separate Data Controller, that organisation is responsible for identifying its own lawful basis and special-category condition.

If you withdraw consent where it is required for us to process your special-category data, we may be unable to continue or complete the relevant service. We will explain any consequences to you when we receive your request.

You may withdraw your consent at any time, although this will not affect processing already undertaken lawfully before withdrawal.

4.3 Personal Data We Process

The personal data we process depends on the nature of your interaction with us and the service being provided.

Website Usage Data

When you use our websites, we may collect information including your IP address, approximate geographical location, browser type and version, operating system, referral source, pages viewed, navigation paths and information about the timing and frequency of your visits.

This information is collected through Google Analytics, Google Search Console, the Shopify ecommerce platform, server logs and website plug-ins. We use it to analyse website usage, maintain security and improve our websites and services.

The lawful basis for this processing is our legitimate interests in monitoring, securing and improving our websites and services and, where required, your consent to the use of non-essential cookies.

Contact and Account Data

We may process your name, email address, telephone number and home or work address. This information may be provided by you, a client acting on your behalf or another authorised person or organisation.

We use this information to administer our services, maintain client accounts, communicate with you, protect the security of our systems and maintain appropriate

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business records.

The lawful basis for this processing is the performance of a contract, taking steps before entering into a contract and our legitimate interests in administering and securing our business and services.

Service Data

We may process personal data provided or created in connection with our services, including:

- Name.
- Date of birth.
- Telephone number and email address.
- Postal address.
- Passport, driving licence or other identification details.
- National Insurance number.
- Payment and transaction information.
- Information contained in service documentation, correspondence and test or assessment records.

Depending on the service, we may also process special-category data, including:

- Health and medical information.
- Current medication.
- Genetic data.
- Racial or ethnic origin.
- Biological samples and associated test or assessment results.

Service data may be obtained from you, a client acting on your behalf, an employer, solicitor or other authorised organisation, or a sample collector, laboratory, occupational health provider or other professional involved in delivering the service.

We process service data to arrange, administer and deliver the requested service, communicate with relevant parties, maintain appropriate records and ensure the security and integrity of our services.

The applicable lawful basis and, where relevant, special-category condition will depend on the service and whether Crystal Health Group is acting as a Data Controller or Data Processor, as explained in sections 2 and 4.2.

Publication Data

With your consent, we may publish information that you provide for publication, such as feedback, survey responses or testimonials. We use this information only for the purposes explained when your consent is obtained.

The lawful basis for this processing is consent, which you may withdraw at any time.

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Enquiry Data

We may process information contained in an enquiry about our services. We use this information to respond to the enquiry, provide relevant information or quotations and take steps towards providing the requested service.

The lawful basis for this processing is taking steps at your request before entering into a contract and our legitimate interests in responding to enquiries and administering our business.

Transaction Data

We may process information relating to purchases, payments, refunds and other transactions. This may include your contact details, the service purchased, the transaction amount, payment status and related transaction records.

We use this information to supply services, process and reconcile payments, issue refunds, respond to payment queries and maintain appropriate financial records.

The lawful basis for this processing is the performance of a contract, compliance with our legal obligations and our legitimate interests in administering our business and financial records.

Correspondence Data

We may process information contained in communications sent to or received from you, together with associated information such as the date, time, sender and recipient.

We use this information to communicate with you, administer our services, maintain appropriate records and establish, exercise or defend legal rights.

The lawful basis for this processing is the performance of a contract and our legitimate interests in administering our business, maintaining records and managing communications.

Call Recordings

Calls to and from Crystal Health Group may be recorded for quality monitoring, training, maintaining evidence of business communications, regulatory compliance, security and the prevention or investigation of misuse.

You will be informed when a call is being recorded. If payment-card details are provided during a call, the recording will be paused so that those details are not recorded. Call recordings are accessible only to authorised personnel.

The lawful basis for recording calls is our legitimate interests in monitoring service quality, training personnel, maintaining accurate records and protecting our business and clients. Where applicable, recordings may also be processed to comply with legal or regulatory obligations.

Call recordings are within the scope of applicable individual rights, including subject access and erasure requests, although those rights may be subject to legal

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exemptions.

Other Processing

We may process personal data where necessary to establish, exercise or defend legal claims, obtain professional advice, maintain insurance coverage, manage business risks, comply with a legal obligation or protect the vital interests of an individual.

Please do not provide another person's personal data unless you are authorised to do so or we have requested that information for a legitimate purpose.

4.4 Sharing Personal Data

We only share personal data where it is necessary for a legitimate purpose, permitted by law and proportionate to the service being provided.

Depending on the circumstances, personal data may be shared with:

- **Laboratories, occupational health providers and other professional service providers** involved in delivering the requested test, assessment or related service.
- **Approved sample collectors, clinicians and contractors** involved in arranging or carrying out the service.
- **Technology, communications and hosting providers** that support our case-management, appointment, telephony, email, website and data-storage systems.
- **Payment providers**, including Worldpay, American Express, PayPal and Shopify Payments, where required to process payments, refunds or related queries.
- **Delivery and logistics providers** where physical documents, kits or samples need to be transported.
- **Insurers, auditors, legal advisers and other professional advisers** where necessary to manage risk, obtain advice, maintain insurance or establish, exercise or defend legal claims.
- **Regulators, law-enforcement bodies, courts and other public authorities** where disclosure is required or permitted by law.
- **A person or organisation nominated by you**, where appropriate authority or third-party consent has been obtained.

Where a service provider processes personal data on our behalf, we require appropriate contractual, confidentiality and security arrangements to be in place.

Certain laboratories, occupational health providers and other professional service providers may act as separate Data Controllers. Where this applies, they are responsible for their own processing, retention arrangements and handling of individual rights requests. The relevant provider will be identified in the applicable service or consent documentation where appropriate.

Where another person or organisation requests access to your personal data, we will verify their identity and authority before making any disclosure. We will only disclose information where you have provided appropriate authority or consent, where disclosure is necessary for the agreed service, or where it is otherwise permitted or required by law. Further information may be provided in the consent terms applicable to the chosen service.

4.5 International Transfers

Crystal Health Group's offices are located in the United Kingdom. Our primary website

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and server-hosting facilities are situated in the United Kingdom and Ireland.

Some of the technology, analytics, payment and other service providers we use may process or allow access to personal data from countries outside the United Kingdom.

Where personal data is transferred outside the United Kingdom, we ensure that the transfer complies with applicable data protection law. This may include:

- Transferring personal data to a country covered by UK adequacy regulations.
- Using an approved transfer mechanism, such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses.
- Applying other appropriate safeguards or relying on a permitted legal exception where applicable.

Where appropriate, we also assess the protections available in the destination country and require suitable contractual, technical and organisational safeguards.

You may contact our Data Protection Officer for further information about the safeguards used for international transfers relevant to your personal data.

4.6 Retaining and Deleting Personal Data

We retain personal data only for as long as reasonably necessary for the purpose for which it was collected, including meeting applicable legal, regulatory, contractual and professional requirements.

The retention periods applied to Crystal Health Group records are detailed in our Archive Policy. These periods take account of:

- The nature and sensitivity of the personal data.
- The purpose for which it is processed.
- Applicable legal and regulatory requirements, including the Human Tissue Act where relevant.
- Relevant professional and industry guidance.
- The potential need to establish, exercise or defend legal claims.

You may contact us on 0800 988 7107 for information about the retention period applicable to a particular Crystal Health Group service or record.

When personal data is no longer required, it will be securely deleted, destroyed or anonymised in accordance with our documented procedures.

A laboratory, occupational health provider or other professional service provider acting as a separate Data Controller may retain clinical, medical or other professional records in accordance with its own legal, regulatory and professional obligations and documented retention schedule. Requests concerning those independently controlled records may need to be directed to the relevant provider.

We may retain personal data for longer where necessary to comply with a legal or regulatory obligation, respond to a court order, establish, exercise or defend legal claims, or protect the vital interests of an individual.

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4.7 Amendments to This Policy

We review this policy regularly and may update it to reflect changes in legislation, regulatory guidance, our services or the way in which we process personal data.

The current version will be available on our website. Where a change materially affects how we use personal data or the rights of individuals, we will take reasonable steps to bring the change to the attention of those affected before the new processing begins, where required.

4.8 Your Data Protection Rights

Your rights depend on the circumstances and the lawful basis on which personal data is processed. These rights are not absolute and may be subject to legal exemptions.

Where Crystal Health Group acts as a Data Controller, your rights may include:

- **Right of access** – you may request confirmation that we process your personal data and obtain a copy of that data together with relevant supplementary information.
- **Right to rectification** – you may ask us to correct inaccurate personal data or complete information that is incomplete.
- **Right to erasure** – you may ask us to delete personal data and, where applicable, securely destroy a retained sample where there is no lawful reason for us to continue processing or retaining it. This right may not apply where retention is required by law, regulation or professional obligations, or where the information or sample is required to establish, exercise or defend legal claims.
- **Right to restrict processing** – you may ask us to restrict the use of personal data in certain circumstances, including while its accuracy or the lawfulness of the processing is being considered.
- **Right to object** – you may object to processing based on legitimate interests where your particular circumstances justify doing so. We will stop the processing unless we can demonstrate compelling legitimate grounds or the processing is required for legal claims.
- **Right to data portability** – where processing is based on consent or contract and carried out by automated means, you may request personal data you provided to us in a structured, commonly used and machine-readable format.
- **Right to withdraw consent** – where processing is based on consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing undertaken before consent was withdrawn.
- **Rights relating to automated decision-making** – where applicable, you have rights concerning decisions made solely through automated processing that produce legal or similarly significant effects.
- **Right to complain** – you may make a data protection complaint directly to Crystal Health Group and also have the right to complain to the Information Commissioner's Office.

Where Crystal Health Group acts as a Data Processor, the relevant client acting as the Data Controller is primarily responsible for responding to your request. We will assist that client as required and may refer your request to them.

Where personal data is controlled independently by a laboratory, occupational health provider or another professional service provider, requests relating to those records should normally be directed to that organisation. We will provide reasonable assistance in

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identifying the relevant Data Controller where necessary.

Making a Request

You may exercise your rights verbally or in writing using the contact details contained in this policy. Subject Access and Right to Erasure/Sample Destruction forms are available to help you provide the relevant information, but their use is not mandatory.

We may request reasonable and proportionate evidence of your identity before responding. Where a request is made by another person on your behalf, we will also require evidence that they are authorised to act for you.

We will respond without undue delay and normally within one month of receiving a valid request and any necessary evidence of identity or authority. Where a request is complex or multiple requests have been made, we may extend the response period by up to a further two months. If an extension is required, we will explain this within the initial one-month period.

We will undertake a reasonable and proportionate search for the requested personal data.

Requests are normally handled without charge. We may charge a reasonable fee or refuse to act only where a request is manifestly unfounded or excessive, or where additional copies of information already provided are requested. If we refuse to act, we will explain the reason and provide information about the available complaint and enforcement options.

4.9 Data Protection Complaints

If you have concerns about how Crystal Health Group has collected, used, shared, retained or otherwise processed your personal data, you may make a data protection complaint directly to us.

Complaints may be made:

- By email to info@crystal-health.co.uk.
- By telephone on 0800 988 7107 or 0161 359 4187.
- By post to:

FAO: Data Protection Officer
Crystal Health Group
The Old Chapel
53 Peel Street
Eccles
Manchester M30 0NG

You do not need to use a particular form or refer specifically to data protection legislation. Please provide sufficient information for us to understand and investigate your concerns.

We will:

- Acknowledge receipt of your complaint within 30 days.
- Take appropriate steps to investigate and respond without undue delay.
- Keep you informed of the progress of our investigation.
- Explain the outcome and any action taken without undue delay.

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We may request reasonable evidence of identity or authority where this is necessary to investigate the complaint securely.

Where Crystal Health Group acts as a Data Processor, we may refer the complaint to the relevant client acting as the Data Controller and assist them with their investigation. Where the complaint concerns records controlled independently by a laboratory, occupational health provider or other professional service provider, we will help identify the appropriate Data Controller where reasonably possible.

You also have the right to complain to the Information Commissioner's Office. Further information is available at www.ico.org.uk or by telephone on 0303 123 1113.

4.10 Cookies and Similar Technologies

Cookies are small text files that are placed on your device when you visit a website. Similar technologies may also store or access information on your device. They help websites operate securely, remember preferences and provide information about how visitors use them.

We may use the following categories:

- **Strictly necessary cookies** – required for the operation, security and basic functionality of our websites, including maintaining sessions, processing forms and payments, and recording cookie preferences.
- **Functional cookies** – used to remember choices or preferences and provide enhanced website functionality.
- **Analytics cookies** – used to understand how visitors use our websites, measure performance and help us improve our services.

We use Google Analytics to collect information about website usage, such as pages visited, time spent on the website, device and browser information and general interaction patterns. Google processes this information on our behalf to provide website usage reports. Further information is available in Google's Privacy Policy.

Where consent is legally required, non-essential cookies and similar technologies will not be used unless you have provided consent. You may accept, reject or manage these technologies through the cookie controls available on the relevant website and may change your preferences at any time.

Certain technologies may be used without consent where an exemption under the Privacy and Electronic Communications Regulations applies, including where they are strictly necessary to provide a requested service. Where we rely on an exemption for statistical purposes or another permitted purpose, we will provide clear information and a simple means of objecting where required.

You may also control or delete cookies using your browser settings. Blocking certain cookies may affect the operation or functionality of parts of the website.

Further information about the specific cookies used, their purposes and duration is provided through the cookie settings available on the relevant website.

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4.11 Contact Details and Data Protection Officer

Crystal Health Group Limited is registered in England and Wales under company number 10804496.

Registered office:

300 St Mary's Road
Garston
Liverpool
England
L19 0NQ

Principal place of business:

The Old Chapel
53 Peel Street
Eccles
Manchester
M30 0NG

Crystal Health Group Limited is registered with the Information Commissioner's Office under registration number **ZA260675**.

You can contact us:

- By post at our principal place of business.
- Through the contact form on our website.
- By telephone on 0800 988 7107 or 0161 359 4187.
- By email at info@crystal-health.co.uk.

Our Data Protection Officer can be contacted using the same details, with correspondence marked:

FAO: Data Protection Officer

5. Version Control

Previous Version	Changes	Last Effective Date	Reviewed and authorised by:
v11.08.25	Annual review and transfer to the approved Word policy template. Updated to reflect the Data (Use and Access) Act 2025 and current ICO guidance. Clarified Data Controller and Data Processor responsibilities, independent provider arrangements, retention, international transfers, individual rights and data protection complaints. Simplified and reorganised the policy and removed the contents page, Health & Safety section and Third-Party Consent	18/08/2026	John McChrystal

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	diagram.		
v10.01.25	Addition of Data Processor statement in Purpose section.	12/08/2025	John McChrystal
v09.08.23	- Change of title to Privacy Policy. - Complete professional review by commercial solicitor to comply with current legislation.	13/01/2025	John McChrystal
v08.06.23	- Addition of call recording to section 5.1. - Addition to suppliers in section 5.2	22/08/2023	John McChrystal
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	John McChrystal
v06.06.21	- Addition of supplier in section 5.2 - Update to both SAQ and RTE web urls	30/06/2022	John McChrystal
v05.04.21	Update to Third Party Consent process flow.	02/06/2021	John McChrystal
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	John McChrystal
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	John McChrystal
v.02.04.18	Addition of suppliers and contractors to section 5.4 Retaining and deleting personal data.	09/04/2019	John McChrystal
v.01.06.17	Complete review and update to comply with GDPR requirements.	27/04/2018	John McChrystal

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