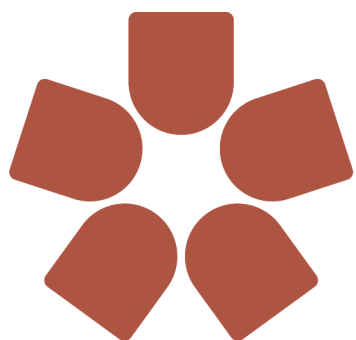




Yorkshire Dental Suite

PRIVACY POLICY

This privacy policy sets out how YDS Group Ltd and Yorkshire Dental Suite (Holdings) Ltd (and any company that is part of either the YDS Group Ltd group of companies, or part of the Yorkshire Dental Suite (Holdings) Ltd group of companies, where in relation to a company, group means that company, any subsidiary undertaking or any holding company from time to time of that company, and any subsidiary undertaking from time to time of a holding company of that company. Each company in a Group is a member of the Group) (**The YDS Group**) uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can view the full version of the privacy policy here www.yorkshiredentalsuite.co.uk/privacy-policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

Privacy policy

This privacy policy gives you information about how The YDS Group collects and uses your personal data through your use of our websites, apps and online services, and through your interactions with us in person, by telephone, email, post or otherwise, including any data you may provide when you enquire about, purchase or receive a product or service from us.

Our websites, apps and services are not intended for children, and we do not knowingly collect data relating to children.

Controller

YDS Group (**Group**) is made up of different legal entities, details of which can be found [here](#). This privacy policy is issued on behalf of the Group so when we mention "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. The YDS Group is the controller and responsible for this privacy policy and for the personal data collected through our websites, apps, services and in-person interactions.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights ([paragraph 9](#)), please contact the DPO using the information set out in the contact details section ([paragraph 10](#)).

2. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Some Medical Data may include information about your health and is treated as special category data. Where we process Medical Data, we will only do so where we have an appropriate legal basis and, where required, an additional condition under data protection laws, such as your explicit consent or where the processing is necessary for the provision of health care or treatment.

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Medical Data** includes medical history forms, dental records, intraoral scans, photographs and other images of your teeth and mouth, treatment plans, consent forms, allergy information, details of medication you take, and such other medical information we may hold from time to time.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our websites, apps or online services.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our websites, apps, products and services, including when you engage with us online or in person.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website, app, product or service feature in order to analyse general trends in how users are interacting with our websites, apps, products and services to help improve our service offering and customer experience.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Your interactions with us.** You may give us your personal data by filling in online forms, creating or using an account or app, attending consultations, appointments or treatment, providing photographs, scans or other information in person or remotely, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - ✓ apply for our products or services;
 - ✓ attend a consultation, appointment or treatment, whether in person, by telephone or by video call;
 - ✓ provide dental scans, photographs, medical history forms, consent forms or other clinical information;
 - ✓ create an account on our smile white app;
 - ✓ subscribe to any of our services;
 - ✓ request marketing to be sent to you;
 - ✓ enter a competition, promotion or survey; or
 - ✓ give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our websites, apps or online services, 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 [here](#) for further details.

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
- Technical Data is collected from the following parties:
 - ✓ analytics providers such as Google based outside the UK;
 - ✓ advertising networks such as Google, TikTok and Facebook based outside the UK;
 - ✓ search information providers Google based outside the UK.
- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services such as Omni Capital, Klarna, Super payments, Shopify, Stripe based inside the UK. Identity and Contact Data is collected from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. HOW WE USE YOUR PERSONAL DATA

Legal basis

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:

- **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.
- **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).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **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 you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis [and retention period]
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you. Processing is necessary to register you as a patient and provide dental services you have requested. For example, we need your name and date of birth to create a patient record and your contact details to confirm appointments or communicate about your treatment. We will retain this information as part of your patient record for at least 11 years after the last treatment, in line with dental record retention.
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) Where necessary, we may process your identity, contact and financial information to collect or recover outstanding payments owed to us. This may include contacting you by phone, email or post regarding unpaid invoices, issuing payment reminders, and where appropriate taking steps to recover debts through standard recovery processes. This processing is carried out under our legitimate interests in ensuring we receive payment for services provided and

		maintain the financial stability of our business. Financial and transaction records are retained for 6 years in line with legal and accounting requirements.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you) We process your identity and contact details to communicate with you about services you receive from us, including notifying you about important updates to our terms, services, or policies. Legal obligation – In some cases we are required to keep records of communications, complaints, or regulatory matters to comply with legal or professional obligations. Legitimate interests – We process this information to respond to enquiries, handle complaints, maintain accurate records, and manage our ongoing relationship with patients or customers. We will retain this information for up to 6 years after the end of our relationship with you, unless a longer retention period is required for legal or regulatory reasons.
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our

	Communications	products/services, to develop them and grow our business) Where you choose to enter a prize draw or competition, we process your identity and contact details to administer the entry, contact winners, and deliver any prizes. We may also process profile, usage and feedback information when you complete surveys or participate in promotions to understand how patients or customers use our services, improve the quality of our dental services, and support the development and growth of our business. We will retain this information for up to 12 months after the prize draw, competition or survey has closed, unless we are required to retain it longer for legal, regulatory, or audit purposes.
To administer and protect our business, websites, apps and systems (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation We process identity, contact and technical data to administer and protect our business, websites, apps and systems. This includes activities such as monitoring website and app performance, troubleshooting technical issues, carrying out system maintenance, analysing usage data, ensuring network security, and preventing fraud or unauthorised access to our systems. For example, technical information such as IP addresses and device data may be used to detect suspicious activity or resolve system errors. We may also process this data as part of routine business administration, IT

		support services, or in the event of a business reorganisation or restructuring. We will retain this data for up to 6 years, or for as long as necessary to fulfil the purposes outlined above and comply with legal, regulatory, or security requirements.
To deliver relevant website, app and online content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) We process data to deliver relevant website, app and online content and online advertisements and to understand how effective our marketing activities are. This may include analysing how users interact with our websites, apps and online services, which pages or features are visited, and how advertisements perform. For example, we may use website analytics, app analytics or similar technologies to measure engagement with our content and identify which services or information are most useful to visitors. This helps us improve our websites, apps and services, tailor content to user interests, develop our services, and inform our marketing strategy. We will retain this information for up to 26 months, or for as long as necessary to analyse website performance and support our marketing activities, after which it will be deleted or anonymised where possible.
To use data analytics to improve our websites, apps, products/services, customer relationships and experiences and to measure the	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites and apps updated and relevant,

effectiveness of our communications and marketing		to develop our business and to inform our marketing strategy) We use data analytics to better understand how customers and website or app users interact with our websites, apps, services and communications. This may include analysing usage data, website or app activity and engagement with emails or other communications to identify trends and understand customer needs. For example, we may review which pages or app features are most frequently visited, how users navigate our websites or apps, or how customers respond to our communications. This helps us keep our websites and apps relevant and up to date, improve our services and customer experience, develop our business, and inform our marketing and communication strategies. We will retain this information for up to 26 months, after which it will be deleted or anonymised where possible.
To send you relevant marketing communications,make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data, and, where you have given express consent, share your enquiry or lead details with, or sell them to, selected third-party dental treatment providers who may contact you about alternative services	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR Consent, including express consent for third-party marketing or sharing your details with, or selling them to, selected third-party dental treatment providers for their own direct marketing purposes We may use your identity, contact and profile data to send you marketing communications about our dental services, promotions, or updates that may be relevant to you. For example, we may send information about new treatments, special offers, oral health services, or practice updates that we believe may be of interest based on your previous interactions with us. Where required by law, we will

		only send direct marketing communications where you have given your consent, and you will have the option to opt out or unsubscribe at any time. In some circumstances, we may rely on our legitimate interests to communicate with existing customers about similar services where permitted by law. Where you ask us to refer you, or where you have given express consent, we may share your contact and enquiry details with, or sell them to, selected third-party dental treatment providers, including where we are unable to offer a treatment at a price or on terms suitable for you. We will retain this information for as long as you remain subscribed to receive marketing communications, or until you withdraw your consent or opt out, after which your details will be removed from our marketing lists.
To carry out market research and to develop, test and improve our products, services and technology, including artificial intelligence and machine learning models (AI/ML Models)	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical (f) Medical (g) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products and services and to help us improve and develop our products, services and technology). Consent, and where required explicit consent, for using identifiable Medical Data or other special category data for the AI/ML Model purposes described in this row. We may process your identity, contact, profile, usage, technical, marketing and communications data and, where appropriate, Medical Data when you voluntarily participate in surveys, provide feedback or agree that we may use your scans, photographs, dental records or treatment information for research, product development, technology development or AI/ML Model purposes. AI/ML Model purposes may include

		training, testing, validating or improving AI/ML Models used by Smile White, other members of the Group or approved third-party AI/ML Model providers for dental assessment, case classification, treatment planning, patient onboarding and quality assurance. Where possible, we will use anonymised or aggregated data for these activities. We will retain this information for up to 12 months after the survey or research activity has been completed, unless a longer period is explained to you when you give consent or is otherwise necessary for the relevant research, product development or AI/ML Model purposes. Where we anonymise personal data so that it can no longer be associated with you, we may use the anonymised information indefinitely without further notice to you.
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Direct marketing

During the registration process on our websites or app, or otherwise when your personal data is collected, you may be asked to indicate your preferences for receiving direct marketing communications from the Group via EMAIL, SMS, TELEPHONE, POST. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing, or where you have otherwise given consent where consent is required by law.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with, or sell your personal data to, any third party for their own direct marketing purposes, including selected third-party dental treatment providers who may contact you about alternative services.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the instructions below:

Yorkshire Dental Suite

To stop receiving marketing communications from Smile White, you can update your marketing preferences by clicking the unsubscribe link in any marketing email, reply STOP to stop receiving marketing via SMS or WhatsApp or contact us directly:

Email: hello@yorkshiredentalsuite.co.uk

Phone: [0113 887 9594](tel:0113 887 9594)

Smile White

To stop receiving marketing communications from Smile White, you can update your marketing preferences by clicking the unsubscribe link in any marketing email, reply STOP to stop receiving marketing via SMS or WhatsApp or contact us directly:

Email: hello@smilewhite.co.uk

Phone: [0113 868 7615](tel:0113 868 7615)

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example, relating to order confirmations for a product/service, appointment reminders, updates to our Terms and Conditions, checking that your contact details are correct.

Cookies

For more information about the cookies we use and how to change your cookie preferences, please see [Cookie Policy | Yorkshire Dental Suite](#).

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- Internal Third Parties as set out in the.
- External Third Parties as set out in the.
- Specific third parties such as selected third-party dental treatment providers, dental clinicians, laboratories, finance providers, payment providers, technology providers, approved third-party AI/ML Model providers who support the AI/ML Model purposes described in [paragraph 4](#), marketing partners and other providers who support or receive referrals for the purposes described in this privacy policy.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Where we engage third-party service providers to process personal data on our behalf, we do not allow them to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. This does not apply where you have expressly consented to us sharing your enquiry or lead details with, or selling them to, a third party for that third party's own direct marketing or service-provision purposes, in which case that third party will be responsible for its own use of your personal data.

6. INTERNATIONAL TRANSFERS

We may transfer your personal data outside the UK when we share it within the YDS Group or with service providers who support the purposes described in this privacy policy. The countries involved may include Egypt and South Africa.

Where we make an international transfer, we will ensure appropriate safeguards are in place so that your personal data receives a similar degree of protection to that required under UK data protection law.

We ensure your personal data is protected by requiring all our group companies to follow the same set of rules when processing your personal data. These rules are called "binding corporate rules" (BCR). To view our BCR, please contact us at:-

Yorkshire Dental Suite

Email: DPO@yorkshiredentalsuite.co.uk

Phone: [0113 887 9594](tel:0113 887 9594)

Smile White

Email: DPO@smilewhite.co.uk

Phone: [0113 868 7615](tel:0113 868 7615)

Our overseas service providers may include the categories of third parties described in [paragraph 5](#), including dental clinicians, quality assurance providers, customer support providers and approved third-party AI/ML Model providers, where they support the purposes described in [paragraph 4](#).

For transfers to overseas service providers, those safeguards may include:

- Relying on UK adequacy regulations where they apply.
- Using the International Data Transfer Agreement or the International Data Transfer Addendum to the European Commission's standard contractual clauses for international transfers where no adequacy regulation applies. To obtain a copy of these contractual safeguards, please contact us using the details set out in [paragraph 10](#).

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [\[paragraph 9\]](#) below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. 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.
- Request erasure of your personal data in certain circumstances. 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.

- Object to processing of your personal data 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 (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see OPTING OUT OF MARKETING in [paragraph 4](#) for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. 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.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in [section 4](#) for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you 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.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - 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
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. CONTACT DETAILS

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact our DPO in the following ways:

- Email address: DPO@yorkshiredentalsuite.co.uk / DPO@smilewhite.co.uk
- Postal address: Unit 1 Landmark Court, Beeston, Leeds, LS11 8JT
- Telephone number: **Yorkshire Dental Suite** [0113 887 9594](tel:01138879594) / **Smile White** [0113 868 7615](tel:01138687615)

11. COMPLAINTS

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint. You can complain to:-

Yorkshire Dental Suite

By telephone: [0113 887 9594](tel:0113 887 9594)

By email: complaints@yorkshiredentalsuite.co.uk

By post: Yorkshire Dental Suite, Unit 1 Landmark Court, Beeston, Leeds, LS11 8JT

Smile White

By telephone: [0113 868 7615](tel:0113 868 7615)

By email: complaints@smilewhite.co.uk

By post: Smile White, Unit 1 Landmark Court, Beeston, Leeds, LS11 8JT

12. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on 3rd July 2026.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

13. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.