



## Client Data Protection Statement – United Kingdom & EU

### 1. Who are we?

Second Skin Pty Ltd (ACN 009350467) ("we", "us", "our") is a limited company incorporated in Australia. In the United Kingdom, we operate through our office in London.

We are the data controller of your personal information for the purposes of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2017. This statement describes how we collect, use and share any personal information we have about you.

We are committed to respecting and upholding your rights to privacy protection under the UK Data Protection Act 2018, the GDPR 2017 and the Australian Privacy Principles contained in the Australian Privacy Act 1988 (as amended March 2014).

When we share your personal information with a third party in accordance with this statement, that third party may become a data controller in respect of such personal information (for example, where it processes your personal information for its own purposes). In such event, that third party will be responsible for its own compliance with applicable data protection law in relation to such personal information.

Our lawful basis for processing personal information about you is your consent for us to do so.

### 2. What personal information about you do we hold?

While providing services to you, we may collect, use and share information about you. This may include information from the following sources:

- information you have provided to us;
- information provided to us by third parties about you (such as your next of kin, carers, guardians, doctors, therapists, hospital and/or NHS trust); and
- information about you that we generate while providing services to you.

This information may include:

**Personal details** (such as name, address, telephone number(s), e-mail address and other contact details, age, gender, date of birth);

**Family, lifestyle and social circumstances** (such as details of your next of kin, carers, and other household members and your marital status);

**Financial details** (such as how you are going to pay for services, we are providing to you, including the existence of any fundraising efforts, health, or medical insurance to pay for the services we are providing to you);

**Professional details** (such as your occupation);

**Your medical professionals** (such as your general practitioner and your treating specialists / therapists);

**Insurance details** (such as whether you are covered by medical or health insurance, your policy number and authorisation number);

**Health Information** including

- Information about any medical condition you may have which is relevant to our service;
- What you and your doctors, therapists, nursing staff, medical practitioners, rehabilitation providers and other professionals hope to achieve through the services we are providing to you;

**Photographs or videos** of you taken at the time of your appointment(s) with us, or sent to us by your doctor/therapist or other healthcare professional; and

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**Transaction records** associated with services we have provided to you (such as what garments have been provided in the past, how many garments have been provided, how these were paid for, invoice details for services we have provided to you, details of any special rates or discounts that have been applied).

Second Skin seeks to destroy or de-identify personal information after its legal obligations to retain the information have expired.

### 3. What do we intend to do with your personal information?

We use personal information about you:

- to provide and manage the treatment and care we provide to you, including anything to do with any garment or splint we provide to you;
- to assist with any calls or enquiries you make to us;
- for our internal administrative requirements;
- to provide information to, and to assist, your teachers, doctors, therapists, nursing staff, medical practitioners, rehabilitation providers and other professionals who provide treatment or care to you;
- to provide information to you, your relatives, guardians or other persons associated with you;
- to respond to personal information access requests from you;
- to plan the services, we provide or intend to provide to you;
- for credit assessment (including assessment of your ability to meet your financial commitments);
- for recovering debt;
- to comply with any present or future law, rule, regulation, guidance, decision or directive (including those concerning anti-terrorism, fraud, money laundering and anti-corruption);
- to establish, exercise or defend legal rights;
- to prevent or detect breaches of law, regulation and our policies, and to apprehend and prosecute offenders, including in relation to the prevention of money laundering and fraud;
- to comply with demands and requests made by domestic and foreign regulators, governments and law prevention, detection, investigation and enforcement authorities (including crime, fraud investigation, enforcement and prevention, tax, social or labour authorities, customs authorities and any other authorities or official bodies), courts, tribunals, arbitrators, ombudsmen, mediators and dispute resolution bodies and their representatives; to obtain legal, accounting and other professional advice;
- to obtain advice or provide a third party with information about our business in connection with any sale, merger, acquisition, disposal, joint venture, reorganisation or similar change of our business; and
- any other purposes that are incidental to or connected with the foregoing purposes or otherwise during our legitimate business activity.

With your consent, we may also use your personal information for:

- Medico-legal reports to solicitors, legal counsel, etc.

With your consent we may also use your personal information for the purposes listed below (in relation to which, unless we inform you otherwise when we obtain your consent, we will take reasonable steps to anonymise your personal information):

- research and evaluation;
- to assist in providing practical education and training to Second Skin staff;

- to assist in providing practical education and training to third party medical practitioners; rehabilitation providers and health professionals; and
- marketing (such as in brochures or newsletters supplied to therapists and other medical practitioners).

#### 4. Who do we share your information with?

Second Skin may, from time to time, be required to disclose personal information about you to any of the following recipients or categories of recipients:

- teachers, doctors, therapists, nursing staff, medical practitioners, rehabilitation providers and other professionals (where requested by you or such health professional);
- any person that you request or permit us to keep informed of our activities in connection with you (such as your relatives, guardians, carers and other health professionals, solicitors and other legal and professional advisors). **If you no longer wish us to share your personal information with any such person or to make a change, please contact us** (see "How to contact us", Item 9);
- you, your relatives, guardians or other persons associated with you;
- to our third-party service providers and business associates (including their employees, directors and officers) that we engage;
- any person in connection with any actual or proposed sale, merger, acquisition, disposal, reorganisation, joint venture or similar change of our business on completion of a GDPR compliant Confidential Agreement;
- domestic or foreign regulators, government and law investigation, prevention, detection and/or enforcement authorities, including crime, fraud investigation, enforcement and prevention, tax, social or labour authorities, customs authorities and any other authorities or official bodies;
- domestic and foreign courts, tribunals, arbitrators, ombudsmen, mediators and other dispute resolution bodies and their representatives;
- professional advisers and auditors that we engage;
- professional and self-regulatory bodies; and
- credit and debt recovery agencies.

#### 5. International transfers

Your personal information may be transferred to, and processed by, us, our sub-contractors or agents in a country outside the EEA. As we are a company based mainly in Australia, we will need to transfer your personal information to Australia so that we can provide the services to you and fabricate your splint or garment.

We will ensure that any transfer to a country outside the EEA will offer an equivalent level of protection for personal information as required by the laws in the United Kingdom.

#### 6. Storage and security

Second Skin stores personal information:

- a. contained in paper based and other hard copy documents in a dedicated storage facility located in our head office premises or regional offices, and
- b. contained in electronic records in a secure environment.

Such records are only accessible by those persons who require access to the personal information to carrying out their employment.

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## 7. Access to your information and correction

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. We also update third parties to whom we have supplied your information.

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us using the contact details in Item 9.

If you require further information in relation to your rights under UK data protection law, you can visit the Information Commissioners Office website (the UK regulator in respect to data protection) at [www.ico.gov.uk](http://www.ico.gov.uk).

## 8. Changes to our Data Protection Statement

This statement represents our policy as of January 2021. We may change this statement from time to time. This may be for several reasons, including changes in the law, best practice or our treatment of your personal information. We will inform you of any changes we make to this statement.

## 9. How to contact us

If you have any questions about this policy or any concerns regarding the treatment of your personal information by Second Skin, or if you would like to update or amend your personal information or exercise any of your rights under data protection law, please contact us using the details set out below:

### **Second Skin**

Unit 10, Spectrum House  
32-34 Gordon House Road,  
Gospel Oak  
London NW5 1LP  
P: +44 203 627 9937  
E: [london@secondskin.com.au](mailto:london@secondskin.com.au)

10. We have appointed Saltire Data Protection Services Limited to act as our representative in the European Union as required under Article 27 EU GDPR. You can always contact us directly if you are located in the EU and wish to raise any issues or queries you may have relating to the processing of your personal data. However, if you wish to contact Saltire Data Protection Services Limited you can do so by following this link:  
<https://app.saltiredataprotection.eu/enquiry/rs/secondskin>