

## **PTP Privacy Policy**

### **1. What this policy covers**

This policy applies to you if you have ever enrolled or registered with the K2 Medical Systems Perinatal Training Package (PTP), including PTP hospital administrators, clinicians, students and PTP personal license holders.

### **2. Who we are**

K2 Medical Systems is the data controller in relation to the processing activities described below. This means that K2 Medical Systems decides why and how your personal information is processed.

K2 Medical Systems process your personal details on a 'legitimate interest' basis under the contractual arrangements with the hospital or with your personal license agreement if you have one.

Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it is referring to K2 Medical Systems.

### **3. What information do we collect about you and how do we collect it?**

Information that you give to us:

As soon as you enrol with us, we create a record in your name. To that record we add information that you give us when enrolling and throughout your K2 training. We keep records of your participation in learning modules.

We hold general information about you, such as your name, email address, professional body registration number (if applicable), username, designation (job role), Country of residence, PTP training records, assessments and their results.

We will automatically collect information about your PTP participation within the online learning and assessment activities, your use of the modules, their completion status.

### **4. How do we use your personal information?**

We collect and process personal data about you in order to deliver our services, and support you, to manage our operations effectively, and to meet our legal requirements.

We are committed to the data protection principles of good practice for handling information.

All personal information is held securely within approved data centres and we will only transfer data within K2 Medical Systems on a 'need-to-know' basis so that we can support our services to you.

PTP does not contain automated decision making features. Decisions on whether you have met your training requirements are made by PTP administrators at your hospital and are based on the hospital's own criteria.

## **5. Who do we share your information with?**

When you are enrolled onto the PTP, your information will be made available to your hospital PTP administrator who manages your training at a local level.

Other ways we may share your personal information:

We may transfer your personal information to a third party if K2 Medical Systems ceases to exist and another organisation offers to continue with your PTP. We may also transfer your personal information if we are under a duty to disclose or share it in order to comply with any legal obligation. However, we will always aim to ensure that your privacy rights continue to be protected.

## **6. Do we transfer information outside the European Economic Area (EEA)?**

Information you provide to us is stored within our approved datacentre secure servers, which are located within the EEA.

## **7. How long do we keep your personal information for?**

The length of time we keep your personal information for is determined by a number of factors including our purpose for using the information and our legal obligations.

We have a retention schedule for information and keep identifiable records only for as long as they have a legal or business purpose:

We keep PTP training data at least 20 years after you have completed the last module or certification, in case it is necessary to establish, bring or defend third party legal claims and support your 'right to practise'.

## **8. Your rights**

You have a number of rights in relation to your personal information, which apply in certain circumstances. Some of these rights will come into force under the General Data Protection Regulation (GDPR) on 25 May 2018. In order to exercise any of these rights, please contact us using the details below.

You have the right to:

- access the personal information that we hold about you
- correct inaccuracies in the personal information that we hold about you

In certain circumstances, you may have the right to

- have your details removed from systems that we use to process your personal data
- restrict the processing of your personal data in certain ways
- obtain a copy of your personal data in a structured electronic data file
- object to certain processing of your personal data by us

**NOTE:** By requesting the removal of your personal information, or objecting to its continued processing, you will permanently exclude its use as supporting information to a legal defence and as evidence of your 'right to practice'. Contractual agreements with the hospital will oblige K2MS to inform them of your request and the hospital may prevent its implementation on the basis of their own legal interests.

You can email K2 Medical Systems - [support@k2ms.com](mailto:support@k2ms.com) - to place requests regarding these rights.

If you are concerned about the way we have processed your personal information, you can complain to the Information Commissioner's Office (ICO). Please visit the [ICO's website](#) for further details.

## 9. Contact Us:

Email: [Support@k2ms.com](mailto:Support@k2ms.com)  
Telephone: +44 (0)1752 397800  
Post: The Data Protection Officer, K2 Medical Systems, Summit House, 26 William Prance Road, Plymouth PL6 5WR.

## Glossary

### Personal data

According to the General Data Protection Regulation, 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### Cookies

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile phone browser from a website's computer and is stored on your computer's or mobile phone's hard drive. Each website can send its own cookie to your browser if your browser's preferences allow it, which the site can then access when you visit it again to track online traffic flows, for example. A website cannot access cookies sent by other websites.

### Data Controller

A data controller determines the purposes for which and the manner in which any personal data are processed. In essence, this means that the data controller decides how and why personal data are processed.