

BACKGROUND:

We understand that your privacy is important to you and that you care about how your Personal Data is used and shared online. We respect and value the privacy of everyone who visits and/or makes use of this website, www.denven.com (“Our Site”) and will only collect and use Personal Data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site and/or purchase of any services via Our Site or off-line. If you do not accept and agree with this Privacy Policy, you must stop using Our Site and services immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site and/or in order to purchase services via Our Site or off line;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 13, below;
“Data Protection Regulation”	means all legislation in force in the United Kingdom from time to time relating to data protection and privacy including, but not limited to, the Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendment Etc.) (EU Exit) Regulations 2019, and any successor legislation relating to data protection and privacy, and only if you are an EU or EEA resident and if applicable the General Data Protection Regulation (EU Regulation 2016/679);
“Personal Data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site or otherwise. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Regulation; and
“We/Us/Our”	means Denven.

2. Information About Us

- 2.1 Our Site is operated by Denven, 16 Cannon Hill, Southgate, London, N14 7HD, United Kingdom.

3. What Does This Policy Cover?

- 3.1 This Privacy Policy applies to your use of Our Site and/or purchase of services via Our Site or off-line including but not limited to in your personal capacity or as a representative of a legal entity.
- 3.2 Our Site may contain links to other websites or apps, and as part of Our services We may offer to provide references to third-party suppliers of goods or services. Please note that We have no control over how your Personal Data is collected, stored, or used by other websites and apps or third-party suppliers. We advise you to check the privacy policies of any such websites, apps and third-party suppliers before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the Data Protection Regulation, which this Policy and Our use of Personal Data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of Personal Data;
 - 4.1.2 The right of access to the Personal Data We hold about you;
 - 4.1.3 The right to rectification if any Personal Data We hold about you is inaccurate or incomplete;
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any Personal Data We hold about you (We only hold your Personal Data for a limited time, as explained in Part 6);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your Personal Data;
 - 4.1.6 The right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);
 - 4.1.7 The right to object to Us using your Personal Data for particular purposes; and
 - 4.1.8 rights with respect to automated decision making and profiling (only if you are an EU or EEA resident and if applicable).
- 4.2 If you have any cause for complaint about Our use of your Personal Data, please contact Us using the details provided in Part 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the United Kingdom's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Personal Data Do We Collect?

- 5.1 Depending upon your use of Our Site and/or purchase of services via Our Site, We may collect some or all of the following Personal Data as well as non-identifiable web browsing information such as the following (please also see Part 13 on Our use of Cookies and similar technologies):
 - 5.1.1 name;
 - 5.1.2 address;

- 5.1.3 email address;
 - 5.1.4 job title;
 - 5.1.7 telephone number;
 - 5.1.13 IP address;
 - 5.1.14 location data;
 - 5.1.15 device type;
 - 5.1.16 web browser type and version; and
 - 5.1.17 operating system.
- 5.2 Subject to Part 5.3 We are not collecting financial information such as credit / debit card numbers, but our payment provider(s) may collect such information. Please refer to the privacy policy of the payment provider(s) for further information about the collection and processing of such information.
- 5.3 We may collect financial information from you in limited circumstances such as when necessary in order to process a refund to you.

6. **How Do We Use Your Personal Data?**

- 6.1 All Personal Data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Regulation at all times. For more details on security see Part 7, below.
- 6.2 Our collection and use of your Personal Data will always have a lawful basis because it is in Our legitimate interest to collect and use such information. Specifically, We may use your data for the following purposes:
- 6.2.1 Providing and managing your access to Our Site and services;
 - 6.2.2 Personalising and tailoring your experience on Our Site;
 - 6.2.3 Providing and managing your Account;
 - 6.2.4 Managing your purchase of goods and/or services via Our Site and off-line;
 - 6.2.5 Supplying Our services to you (please note that We require your Personal Data in order to enter into a contract with you);
 - 6.2.6 Personalising and tailoring Our services for you;
 - 6.2.7 Replying to emails, messages and other types of correspondence from you;
 - 6.2.8 Supplying you with emails that you have opted into. You may unsubscribe or opt-out at any time by pressing unsubscribe on any correspondent email, or contact Us using the contact details below in Part 14 and requesting it;
 - 6.2.9 Market research; and
 - 6.2.10 Analysing your use of Our Site and services and gathering feedback to enable Us to continually improve Our Site and services and your user experience.

- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Regulation.
- 6.4 Third parties whose content appears on Our Site may use third party Cookies, as detailed below in Part 13. Please refer to Part 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your Personal Data at any time, and to request that We delete it.
- 6.6 We do not keep your Personal Data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases): Subject to Part 6.7 We shall as a default keep your data on file for 36 months of your last activity.
- 6.7 When supplying Our Services to you We need your Personal Data and other ID information, and We will keep that as well as details of transactions you carry out via Our Site and off-line in order to comply with public anti-money laundering regulations and bookkeeping, audit, reporting and other public requirements, which requires Us to hold and retain records for seven years after ceasing to provide the services to you.

7. How and Where Do We Store and/or Transfer Your Personal Data?

- 7.1 We only keep your Personal Data for as long as We need to in order to use it as described above in Part 6 or for as long as We have your permission to keep it.
- 7.2 The security of your Personal Data is essential to Us, and to protect your data, We take a number of important measures, including the following:
 - 7.2.1 limiting access to your Personal Data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
 - 7.2.2 implementing procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your Personal Data) including notifying you and/or the Information Commissioner's Office where We are legally required to do so.
- 7.3 We may transfer some or all of your Personal Data to third parties including but not limited to suppliers of dental equipment, pharmaceutical suppliers, hosting providers, payment providers, external parties working as sub-contractors for Us and/or other similar third-party goods and/or service providers.
- 7.4 We may store or transfer some or all of your Personal Data to countries outside the United Kingdom including to countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the United

Kingdom and the EEA. This means that We will endeavour to take additional steps in order to ensure that your Personal Data is treated just as safely and securely as it would be under the Data Protection Regulation as follows:

7.4.1 We may share your data within the group of companies of which We are a part. Where this involves the transfer of Personal Data outside the United Kingdom or the EEA, our group ensures that Personal Data is protected by requiring all companies within the group to follow the same rules with respect to Personal Data usage. These are known as “binding corporate rules”.

7.4.2 We may share your data with external third parties that are based outside of the United Kingdom or the EEA. The following safeguards are applied to such transfers if you are an EU or EEA resident:

7.4.2.1 We will only transfer your Personal Data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission; or

7.4.2.2 We use specific contracts with external third parties that are approved by the European Commission for the transfer of Personal Data to third countries. These contracts require the same levels of Personal Data protection that would apply under the Data Protection Legislation.

7.5 Please contact us using the contact details below in Part 14 for further information about the particular data protection mechanisms used by Us when transferring your Personal Data to a third country.

8. **Do We Share Your Personal Data?**

8.1 We may share your data with other entities in Our group in order to supply services attached to our core business.

8.2 We may share your data with and/or contract with third parties including but not limited to suppliers of dental equipment, pharmaceutical suppliers, hosting providers, payment providers and/or other similar third-party goods and/or service providers. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the Data Protection Regulation.

8.3 We may compile statistics about the use of Our Site and services including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as public authorities, prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the Data Protection Regulation.

8.4 Any transfers of your Personal Data to third-party data processors used by Us that are not located within the United Kingdom or the EEA will follow the principles laid out in Part 7.

8.5 In certain circumstances, We may be legally required to share certain data held by Us, which may include your Personal Data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or public or governmental authorities.

9. What Happens If Our Business Changes Hands?

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any Personal Data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

10. How Can You Control Your Personal Data?

10.1 In addition to your rights under the Data Protection Regulation, set out in Part 4, when you submit Personal Data to Us via Our Site or otherwise, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).

11. Your Right to Withhold Information

11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

11.2 You may restrict Our use of Cookies. For more information, see Part 13.

12. How Can You Access Your Personal Data?

12.1 You have the right to ask for a copy of any of your Personal Data held by Us (where such data is held). Under the Data Protection Regulation, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details using the contact details below in Part 14.

13. Our Use of Cookies

13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and Personal Data is protected and respected at all times.

13.2 By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies may be used on Our Site for, e.g., marketing purposes. For more details, please refer to Part 6, above, and to Part 13.6 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

- 13.3 All Cookies used by and on Our Site are used in accordance with the Data Protection Regulation.
- 13.4 Before Cookies are placed on your computer or device, you will be shown a popup or push notification requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 13.5 Certain features of Our Site depend on Cookies to function. The Data Protection Regulation deems these Cookies to be “strictly necessary”. These Cookies are shown below in Part 13.6. Your consent will not be sought to place these Cookies. You may still block these Cookies by changing your internet browser’s settings as detailed below in Part 13.9, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 13.6 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
hs	Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	Yes
ssr-caching	This cookie is necessary for the cache function. A cache is used by the website to optimize the response time between the visitor and the website. The cache is usually stored on the visitor’s browser.	Yes
XSRF-TOKEN	Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	Yes
.AspNetCore.Antiforgery.nixphHDAMN4	No description available	Yes
Identity.External	No description available	Yes
.AspNetCore.Mvc.CookieTempDataProvider	No description available	Yes

and the following third party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
svSession	wix.com	Tracks a visitor across all wix.com sites. The information collected can be used to make advertisement more relevant for the visitor.

13.7 Our Site uses analytics services provided by wix.com. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products and services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

13.8 The analytics services used by Our Site uses Cookies to gather the required information. The analytics service used by Our Site uses the following Cookies

Name of Cookie	Provider	Purpose
fedops.logger.sessionId	wix.com	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.
ai_user	live.denven.com	A unique user identifier cookie, set by Microsoft Application Insights software, that enables counting of the number of users accessing the application over time.

13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

13.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

13.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email to info@denven.com or by post to Denven, 16 Cannon Hill, Southgate, London, N14 7HD, United Kingdom. Please ensure that your query is clear,

particularly if it is a request for information about the data We hold about you (as under Part 12, above).

15. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

www.denven.com

Last update: 11/08/2022