
PRIVACY POLICY

BACKGROUND:

ILLY Systems Ltd understands 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 this website, <https://links-carepath.co.uk> and all sub-domains (“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. If you do not accept and agree with this Privacy Policy, you must stop using Our Site 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;
“Cookie” and “SessionStorage”	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 section 13, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“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. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
“We/Us/Our”	means ILLY Systems Ltd, a limited company registered in England under company number 8673130, whose registered address is 11 Hoxton Square, London N1 6NU, and whose main trading address is the same.

2. Information About Us

2.1 Our Site is owned and operated by ILLY Systems Ltd, a limited company registered in England under company number 8673130, whose registered address is 11 Hoxton Square, London N1 6NU and whose main trading address is the same.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to

other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, 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 (see section 12);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - 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 section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - 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.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 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 UK’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 Data Do We Collect?

- 5.1 Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies):
- 5.2 IP address;
- 5.3 web browser type and version;
- 5.4 operating system;

6. How Do We Use Your 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 GDPR at all times. For more details on security see section 7, below.

- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - 6.2.1 Providing and managing your Account;
 - 6.2.2 Providing and managing your access to Our Site;
 - 6.2.3 Personalising and tailoring your experience on Our Site;
 - 6.2.4 Replying to emails from you;
- 6.3 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.4 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):
 - 6.4.1 Cookies - as described in section 13;
 - 6.4.2 Personal data held within our applications will be as per contractual requirements of the Data Controller.

7. How and Where Do We Store Your 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 section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.4 Steps We take to secure and protect your data include:
 - 7.4.1 Connection to Our Site is always through HTTPS, preventing your login credentials or personal data from being intercepted in-between your device and Our Site;
 - 7.4.2 Two-factor authentication - Where it is enabled, we force users to provide a second factor of authentication to Our Site, This helps to mitigate the effect of an unauthorised individual learning of a user's account details;
 - 7.4.3 Password storage - All passwords are hashed and salted via a PBKDF2-compliant process. This makes them extremely difficult to crack, even if the database was somehow leaked to a hacker.
 - 7.4.4 IP restrictions - We provide the option to restrict what IP addresses are allowed to access Our Site;
 - 7.4.5 Backup encryption - our offsite backups are encrypted to prevent unauthorised access in the event of data loss;

7.4.6 Password policy - We allow organisations to configure Our Site to support their password security policies;

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

8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.

8.2 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 obligations, a court order, or a governmental authority.

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.

9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes.

10. **How Can You Control Your Data?**

10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, 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.

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. **Your Right to Withhold Information**

11.1 You may restrict your internet browser’s use of Cookies, however, you will not be able to access Our Site.

12. **How Can You Access Your Data?**

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 GDPR, 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 section 14.

13. Our Use of Cookies and Similar technology

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.

13.2 The following first party Cookies may be placed on your computer or device:

Cookie Name / SessionStorage	Purpose	Expires
ASP.NET_SessionID	Managing session	end of session
LINKS_MANAGER_AUTHCOOKIE	authentication	end of session
<username>.linksmanagertwofactor	2 factor authentication (if enabled)	8 hours
diary<userid>	Used in the diary section to store which staff members' diaries are currently selected	End of session
bannerSafeguardingCache_<episodeid>	Cache of the current episode safeguarding information for the client banner	End of session
/ <environment> /carepath/Alert/GetCount.castle{}	Cache of the logged in users unactioned alerts for the navigation bar	End of session
/<environment> /carepath/CaseNote/DraftsForUser.castle{}	Cache of the logged in users saved draft case notes for the navigation bar	End of session
/<environment> /carepath/Client/Alert/GetCount.castle{"episodeId":<episodeId>}	Cache of the current episode unactioned alert count for the client banner	End of session
/<environment> /carepath/CaseNote/DraftsForEpisodeCount.castle{"episodeId":<episodeId>}	Cache of the logged in users saved draft case notes for the current episode for the client banner	End of session
/<environment> /carepath/Client/Notification/GetCount.castle{"episodeId":<episodeId>}	Cache of the current episode notifications for the client banner	End of session
/<environment> /carepath/PrescriptionBannerDashboard/GetRequiresSafeStorage.castle{"episodeId":<episodeId>}	Cache of the current episodes status of requiring or having arranged safe storage	End of session

14. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at privacy@illycorp.com, by telephone on 020 4566 5727, or by post at ILLY Systems Ltd, 11 Hoxton Square, London, N1 6NU. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 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.