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This Privacy Policy is effective as of March 30th, 2026.
We have updated our January 20, 2025, Privacy Policy.

This Kope - Medics Privacy Policy ("Policy") outlines the personal information that Kope - Medics Ltd, ("Kope - Medics", "we", "us" or "our") gathers, how we use that personal information, and the options you have to access, correct, or delete such personal information.

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1. Our Privacy Promise

At Kope - Medics Ltd, our mission to provide specialist care is rooted in the fiduciary trust placed in us by our service users and their families. We commit to communicating transparently, providing clinical-grade security, and protecting the confidentiality of personal and health information.

Kope - Medics operates as a Data Controller under the UK GDPR. We strictly ensure that the processing of health and social care Special Category Data is necessary, proportionate, and handled with clinical-grade confidentiality. We implement the 'Principle of Least Privilege', ensuring data is accessed only on a Need-to-Know basis to facilitate safe clinical intervention.

We do not sell or rent personal information. We will only share or otherwise disclose your personal information as necessary to provide our Services or as otherwise described in this Policy, except in cases where we first provide you with notice and the opportunity to consent as mandated by law.

2. About Us

We are Kope-Medics Ltd, a company incorporated in England and Wales.

- Company Number: 11452179
- Registered Address: Unit 8B, Deptford Park Business Centre, Grinstead Road, London, SE8 5AD.
- Information Governance: For all Data Subject Access Requests (DSAR) or Right to Erasure inquiries, please contact our Information Governance lead at info@kope-medics.com or at our Headquarters address; Unit 8B, Deptford Park Business Centre, Grinstead Road, London, SE8 5AD.
- You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data:
- Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Helpline number: 0303 123 1113
- Website: www.ico.org.uk

3. Policy Application

This Policy applies to the personal information of the following categories of data subjects:

- Service Users & Representatives: Individuals receiving complex care and their authorized representatives under a "Working Together Agreement" or Power of Attorney.

For purposes of this Policy, "Services" shall refer to all the solutions offered and marketed by Kope - Medics or its authorized partners that are designed to increase the performance, security, and availability of care and support made available in connection with the foregoing.

- Administrative & Clinical Users: Those with authenticated credentials to access our Clinical Information Systems.
- Staff & Applicants: Those who visit our offices or provide their information to Kope - Medics or Kope - Medics representatives when they attend or register to attend

our licensed training, those applying for roles via our recruitment portals, or other events at which Kope - Medics (and/or its representatives) participates.

- Website Visitors: Those who visit our websites, including those who may opt to provide an email address or other contact information to receive communications from Kope - Medics, fill out a survey, or provide feedback. For the purposes of this Policy, "Websites" refer collectively to www.kope-medics.com as well as any other websites Kope - Medics operates for its own behalf and that link to this Policy.

4. Information We Collect

We only collect the minimum dataset required for clinical safety to provide safe, goal-oriented clinical care and fulfil regulatory obligations to service users, the CQC, ICBs, and other funding authorities:

- Information you give us: We ask for and at your option collect personal information from you when you visit our offices, submit web forms on our websites, register for or attend a sponsored event or other events at which Kope - Medics (and/or its representatives) participates including opportunities to sign up for and agree to receive email communications from us. We may ask you to submit such personal information if you choose to use interactive features of the Websites, including participation in surveys, requesting customer support, submitting feedback, or otherwise communicating with us. We will send such communications in accordance with applicable law.
- Image and voice: When you participate in a Kope - Medics event, we may ask for your permission to record your voice and/or image during your participation.
- Sensitive Clinical Data: Medical history, biometrics, care plans, and specialized high-dependency requirements (e.g., Tracheostomy or PEG management).
- Professional Data: DBS status, professional registrations (example; NMC), and competency signoffs.
- Technical Data: IP addresses and telemetry data processed to ensure the integrity and security of our digital care records.
- Crash Reports: When our Services encounter an unexpected error, you may be asked to submit a crash report, which may contain personal information. You will have an opportunity to review the content of the report prior to submitting the report to us.

5. How We Legally Process Information We Collect

Under UK GDPR Article 6 and Article 9 (for special category health data), we process information under the following pillars in a way that is compatible with and relevant to the purpose for which it was collected or authorized. As a general matter, for the categories of data above, we may use your personal information to:

- Provide, operate, maintain, improve, and promote the Websites and Services for all users of the Websites and Services.

- Enable you to access and use the Websites and Services.
- Send messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages.
- Comply with legal obligations as well as to investigate unauthorized and illegal activities.
- For other purposes for which we obtain your consent.

We may use the information we collect for the following purposes:

- Send communications, in accordance with your communication preferences, such as providing you with information about products and services, surveys, newsletters, offers, and events about us and our partners; and send other news or information about us and our partners. See the section below for information on managing your communication preferences.
- Personalize the Websites and Services, including by providing features or content that match your interests and preferences.
- To register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to the extent such processing is necessary for our legitimate interest in protecting our offices and our confidential information against unauthorized access.

We process your data for the following Legitimate Business Purposes:

- Deliver Clinical Care: Managing medication regimes, care plans, and emergency protocols.
- Operational Management: Rota coordination, PPE logistics, and training compliance.
- Regulatory Compliance: Maintaining evidence for CQC inspections and local authority audits.
- Security: To identify and prevent fraud and enhance the security of our network and information systems.
- Communications: Circulating internal updates and newsletters where consent has been obtained.
- Health and Social Care Provision: To provide specialist complex care.
- Legal Obligation: To meet our regulatory requirements with the CQC and other governing bodies.
- Legitimate Interests: Where necessary for effective organisational management.

6. Information from Third Party Services

We may combine information we collect as described above with personal information we obtain from third parties.

Data Sharing & Third-Party Disclosure

We work with Sub-processors (Service Providers) for essential functions (examples; Digital Care Record Systems, Payroll Providers and IT Support Services, Regulatory Bodies like CQC/NHS when legally required) who provide us with services that help run our service.

These entities are bound by Data Processing Agreements (DPAs) that prohibit the independent use of your data. These Sub-processors provide services to help us deliver customer support, manage and contact our existing Customers and Administrators as well as improve our Services. These Service Providers (Digital Care Record Systems, Payroll Providers and IT Support Services, Regulatory Bodies like CQC/NHS) may only process personal information pursuant to our instructions and in compliance both with this Privacy Policy, the contracts we have in place with such Service Providers (Digital Care Record Systems, Payroll Providers and IT Support Services, Regulatory Bodies like CQC/NHS), and other applicable confidentiality, data protection, and security measures and regulations.

Specifically, we do not permit our Service Providers (Digital Care Record Systems, Payroll Providers and IT Support Services, Regulatory Bodies like CQC/NHS) to sell any personal information we share with them or to use any personal information we share with them for their own marketing purposes or for any purpose other than in connection with the services they provide to us.

In addition to sharing with Service Providers (Digital Care Record Systems, Payroll Providers and IT Support Services, Regulatory Bodies like CQC/NHS) as described above, we also may share your information with others in the following circumstances:

- To respond to a Subpoena, Court Order, or Statutory Request from the CQC/Local Authority.
- In Emergency Circumstances to prevent immediate physical harm.
- During a Corporate Transaction (Merger/Acquisition) under strict Non-Disclosure Agreements.
- Within Kope - Medics Ltd (defined for the purposes of this Policy as Kope - Medics Ltd (United Kingdom) and its subsidiaries listed).
- When we are required to disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.
- Where we have a good-faith belief sharing is necessary to investigate, prevent or act regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our service or as otherwise required to comply with our legal obligations; or

- As you may otherwise consent from time to time.

7. Notice To UK Residents

"Personal information" as referenced in this Privacy Policy means "personal data" as that term is defined under the European Union ("EU") General Data Protection Regulations ("GDPR") and its United Kingdom ("UK") GDPR counterpart.

Kope - Medics is a data controller for the personal information collected from all categories of data subjects listed above, with the following exceptions: Kope - Medics is a data controller of website visitor Logs and some account settings information.

In addition, Kope - Medics is a data controller for any of the content provided by website visitors. Where Kope - Medics is a data controller, Kope - Medics processes data on behalf of its end users pursuant to their data processing instructions.

If you are an individual from the European Economic Area (the "EEA"), the UK or Switzerland, please note that our legal basis for collecting and using your personal information will depend on the personal information collected and the specific context in which we collect it.

We normally will collect personal information from you only where:

- (a) we have your consent to do so,
- (b) where we need your personal information to perform a contract with you (e.g. to deliver Kope - Medics Service(s) you have requested), or
- (c) where the processing is in our legitimate interests.

Please note that in most cases, if you do not provide the requested information, Kope - Medics will not be able to provide the requested service to you.

In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person. Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. Where we rely on our legitimate interests to process your personal data, you have the right to object.

If you also have any questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us by emailing us at info@kope-medics.com.

8. Data Security & Storage & Retention

In line with Kope - Medics's Information Governance policies, we implement Technical and Organisational Measures to ensure a level of security appropriate to the risk:

- Encryption: Data is encrypted at rest and in transit using industry-standard protocols.

- Retention: Your information is securely stored on our encrypted digital care record systems and secure servers in strict accordance with the NHS Records Management Code of Practice 2021. Once the retention period expires, we will permanently delete digital files and securely shred any physical documentation.
- International Transmissions: Any trans-border data flow is governed by Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs).
- Tiered Access: Digital documents are stored on encrypted drives with access restricted by tier and department.

9. Data Subject Rights and Choices

Kope - Medics recognizes individuals' data protection rights.

You have the right to access, correct, update, port, or delete your personal information, and to restrict or object to the processing of your personal information (each of these a "Rights Request"). You may email us at info@kope-medics.com with any Rights Request, and we will respond within thirty (30) days.

Please note that **before we can complete your Rights Request**, we will need to verify that **your identity matches that of the data in which you are requesting to exercise your rights**.

You can expect a verification email under separate cover, to the email address associated with your personal information on file.

If you are making a Rights Request on behalf of another individual as an authorized agent, we require that either:

- (a) the data subject must verify their identity and directly confirm with Kope-Medics they provided the authorized agent permission to submit the Rights Request,
- (b) the authorized agent must be provided power of attorney by the data subject in accordance with the law of the data subject's jurisdiction, or
- (c) the Rights Request must otherwise be submitted in accordance with applicable privacy law.

Where a Rights Request may implicate the personal information of another individual, we must balance the request against the risk of violating another person's privacy rights. We will comply with Rights Requests to the extent required by applicable law.

If your Rights Request is denied in the EEA, the UK, and Switzerland, you also have the right to lodge a complaint with a supervisory authority.

Please note Kope - Medics has no direct relationship with End Users.

Even where "Kope - Medics" may be indicated as the authoritative name server for a domain, unless Kope - Medics is the owner of that domain, we have no control over a domain's content. Accordingly, we rely on website visitors to comply with the underlying legal requirements for Rights Requests in accordance with their obligations under applicable data protection laws. If you request that we fulfil a Rights Request, we will direct

website visitors to contact the Customer website(s) with which they interacted directly. Our website visitors are solely responsible for ensuring compliance with all applicable laws and regulations with respect to their website users.

10. Notification Of Changes

If we make changes to this Policy that we believe materially impact the privacy of your personal information, we will promptly provide notice of any such changes (and, where necessary, obtain consent), as well as post the updated Policy on this website noting the effective date of any changes.

11. Business Transactions

We may assign or transfer this Policy, as well as information covered by this Policy, in the event of a merger, sale, change in control, or reorganization of all or part of our business.

12. English Language Controls

In the event of any ambiguity or conflict between translations, the English version is authoritative and controls.

13. Your Rights under UK GDPR

- Access & Rectification: You may request a copy of your information or ask us to fix inaccuracies.
- Deletion & Objection: You may request that your information be deleted or object to specific processing.
- Portability: You have the right to request your data be transmitted to another controller.
- Withdrawal of Consent: Where processing is based on consent, you can withdraw it at any time.

14. Contact Us & Complaints

If you wish to exercise your rights, please contact us:

- Email: info@kope-medics.com
- Supervisory Authority: You have the right to complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data:
- Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Helpline number: 0303 123 1113
- Website: www.ico.org.uk

If you have any further queries or comments on our Privacy Policy, please contact us via the following webpage (<https://kope-medics.com/>) or you can contact us by



emailing (info@kope-medics.com). We also welcome your views about our website and our Privacy Policy.

