

Who We Are

UK Independent Medical Limited (UKIM MLR, UKIM Health, UKIM OH&W, Pagin8, Pebble Wellbeing and Pebble Insights) (“we”) are a provider of specialist outsourcing services in the insurance and legal sectors. The following privacy policy explains how we use any personal data we collect about you.

The Purpose for Processing:

We will process your personal data for the following purpose:

Marketing Activities

1. To invite you to events that we believe may be of interest to you.
2. To carry out market research to enable us to improve our services and product offerings.
3. To provide you with information on related services and products that we think your company may be interested in.

Additionally, if you are:-

1. An impending customer of ours (action having been taken to initiate the process of becoming a customer);
2. Currently a customer of ours; or
3. An individual acting on behalf of (1) or (2) above,

(Collectively defined as “Customer”), then we will need to process your personal data for the following purposes:-

Service Provision

- As part of the process of entering into a contract with your company.
 - To facilitate in the provision of services to your company.
 - To provide your business with service updates or important notices.
 - Fulfil our existing contractual obligations to your company.
 - In order to defend any claim that may be brought against us in respect of the work we undertake as a business.
 - To process your personal data in line with any legal obligations we are required to comply with. This will include our obligations to you in relation to the processing of your personal data.

For both of these purposes, the following personal data categories are collected: Name, Email, Business Address.

For Privacy information aimed at the end-users of our service, i.e. Occupational Health or EAP clients, this can be found within the privacy notice of the relevant dedicated website.

- Privacy Notice | UKIM Occupational Health & Wellbeing
- Privacy - Pebble Wellbeing

Lawful Basis for Processing

We will process your personal data in line with one of the following lawful bases:

Consent

We will be processing your personal data on the basis of consent for marketing purposes.

Legitimate Interests

We may also process your personal data within our Legitimate Interests.

Contractual

If you are a customer then it will be necessary for us to process your personal data as part of fulfilling the existing, or soon to be established contractual agreement between UK Independent Medical Ltd. and the customer.

Legal Obligations

We may be required to process your personal data to comply with our legal obligations. This can include complying with a subject access request you have made, supplying personal data to public authorities once we have verified a request or complying with a request from you to remove your data from our systems.

Categories of Recipients

- We will never share your information with any third parties for the purpose of selling or advertising goods or services to you.
- We will share your personal data with email marketing software providers and selected third parties on occasion; this is simply for the purpose of facilitating in the distribution of communications to you.
- We utilise Netpresto as a web hosting provider, who will firstly receive the data that is inputted into the website before transferring it onto UKIM. This service provider utilizes data back-ups and redundancy for added integrity and resilience, in which the data inputted into the website will be backed up and retained in a German data centre.

The information regarding you provided through the referral will be entered into either our third-party cloud hosted case management system, OPAS G2 which is provided by Civica, for the OH On-Demand service. Further information regarding Civica's use of your personal data can be found on the privacy notice displayed on the OPAS G2 portal. For the EAP Service "Pebble On-Demand", your data will be stored in our application Proclaim which is provided by The Access Group, however the data is stored

within our Group IT Infrastructure. Information about Access's use of your personal data can be found on the privacy notice on The Access Group website.

- We may utilize our panel of medical experts in order to facilitate our service to your Employee. All third parties are fully vetted to ensure that your data is only shared and stored with companies that comply with all applicable Data laws, including the UK General Data Protection Regulation and the Data Protection Act 2018.
- All third parties are placed through a Due Diligence procedure to ensure industry standards of information security.
- Your personal data will not be shared or stored outside of the UK or EEA.

Retention Period

If we are solely processing your personal data for marketing purposes, then we will retain your personal data unless you have advised us that you have withdrawn your consent or have opted out of marketing carried out on the basis of legitimate interest.

If you are a customer, we will need to retain your personal data for the duration of our contractual relationship. Following the termination of your contract, we will also need to retain your personal data for legal and regulatory purposes:

- For a further 7 years minimum following the completion of the service, this is in line with our legal obligations surrounding the retention of data produced during occupational health services.

Your Rights:

Under the UK GDPR you have the following rights in relation to your personal data.

- **Right to Access** – You have a right to request a copy of your personal data.
- **Right to Rectification** – You have the right to ask us at any time to make any corrections or remove any personal data that you believe is inaccurate.
- **Right to Data Portability** – You have the right to request for the information we hold about you to be provided in a portable format.
- **Right to Erasure** – You have the right to request the erasure of the personal data. However, we may still need to keep basic contact information about you if you are already or will shortly be an active customer as we will require this for contractual purposes.
- **Right to Restriction** – You have the right to request a restriction in the processing of your personal data. However, we may still need to keep basic contact information about you if you are already or will shortly be an active customer as we will require this for contractual purposes.
- **Right to Objection** – You have the right to object to the processing of your personal data. However, we may still need to keep basic contact information about you if you are already or will shortly be an active customer as we will require this for contractual purposes.

We will aim to respond to any requests relating to your rights without undue delay and in any case within 1 calendar month of receipt of your request. If we are unable to comply with a request for any reason, then we will provide you with a full justification in writing within 1 calendar month of receipt of your request. We may ask you to confirm your identity so that we can validate a request. If you would like to make a request, please email or write to us using the contact details provided below.

To Withdraw Consent

You have the right to withdraw your consent to the use of your personal data for marketing activities. You can withdraw your consent to marketing activity at any time using the unsubscribe link located at the bottom of any of our marketing emails. Alternatively, you can contact a member of the marketing team by emailing us at marketing@ukindmed.com.

If you are a customer, we will still need to keep basic contact information about you as we will require this for contractual purposes.

Complaints

If you are unhappy about any aspect of our process and you would like to file a complaint, please contact us using the details below.

Alternatively, if you would like to make a complaint or report a concern about the way in which we have processed your personal data, please contact the Information Commissioner's Office who will be able to provide further assistance.

Changes to our Privacy Policy

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated on 30th September 2025.

Contact Us

If you have any further questions or would like to raise any concerns about the way in which your personal data has been processed, please feel free to contact our Data Protection Officer using the information provided below:

Email: marketing@ukindmed.com – Please indicate in the header of the email that the email is intended for the Data Protection Officer.

Write to us:

Data Protection Officer
Legal and Compliance Dept
Brenner House,
Rainton Bridge Business Park,
Houghton-le-Spring,
DH4 5RA