



Privacy & Cookie Policy

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1 – Introduction & scope

This Privacy & Cookie Policy applies to Komplex Group Ltd (Company Number 11516139) and its subsidiary companies, trading divisions and brands (together referred to throughout this Policy as "Komplex Group").

At the date of publication, this includes:

Company	Companies House Number
Komplex Group Ltd	11516139
Komplex Care Limited	12116144
Komplex Health Ltd	12932672
Komplex Community Ltd	12955231
Rola Property Limited	12776894

References throughout this Policy to "Komplex Group", "we", "us" or "our" refer to Komplex Group Ltd and, where applicable, any of its subsidiary companies, trading divisions, brands or successor organisations operating under the Komplex Group structure.

The organisation acting as the Data Controller for a particular service, contract or processing activity will depend on the nature of the services being provided. Where this differs from Komplex Group Ltd, the relevant company will be identified within the applicable privacy information, contractual documentation or other communications.

This list may be updated from time to time to reflect changes to the Komplex Group corporate structure, including the incorporation, acquisition, disposal or reorganisation of subsidiary companies.

This Privacy & Cookie Policy explains how Komplex Group Limited and the companies and brands operating within Komplex Group collect, use, disclose, retain and protect personal information. It applies to individuals receiving or enquiring about our services, relatives and representatives, professionals, commissioners, website visitors, job applicants, employees and other people who interact with us.

We process personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 (PECR) and relevant health, social care, employment and regulatory requirements.

2. Definitions

For the purposes of this Privacy & Cookie Policy, the following definitions apply.

- **Komplex Group** means Komplex Group Ltd (Company Number 11516139) together with its subsidiary companies, trading divisions and brands, including Komplex Care Limited (Company Number 12116144), Komplex Health Ltd (Company Number 12932672), Komplex Community Ltd (Company Number 12955231), Rola Property Limited (Company Number 12776894), and any future subsidiary, trading division or brand operating under the ownership or control of Komplex Group Ltd.
- **Personal Information (Personal Data)** means any information relating to an identified or identifiable living individual. An identifiable individual is someone who can be identified directly or indirectly from that information.
- **Special Category Data** means personal information that is afforded additional protection under UK GDPR because it relates to matters such as an individual's health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data used for identification, or information concerning a person's sex life or sexual orientation.
- **Data Controller** means the organisation that determines the purposes for which, and the manner in which, personal information is processed.
- **Data Processor** means any organisation or individual that processes personal information on behalf of a Data Controller and only in accordance with the Controller's instructions.
- **Processing** means any operation performed on personal information, whether by automated or manual means. This includes collecting, recording, organising, storing, using, sharing, retrieving, consulting, amending, restricting, deleting or securely destroying personal information.
- **UK GDPR** means the United Kingdom General Data Protection Regulation, as incorporated into UK law and supplemented by the Data Protection Act 2018.
- **PECR** means the Privacy and Electronic Communications (EC Directive) Regulations 2003, which govern electronic marketing communications, cookies and similar technologies.
- **Cookies** means small text files or similar technologies that are placed on a user's device to enable website functionality, remember preferences, improve user experience, analyse website usage and support marketing activities where appropriate.
- **International Transfer** means the transfer of personal information to a country or territory outside the United Kingdom where UK data protection legislation requires appropriate safeguards to ensure that personal information continues to receive an equivalent level of protection.
- **Data Subject** means the individual to whom personal information relates.

3. Who is responsible for your information?

Komplex Group Limited Komplex Group Limited (Company Number 11516139), whose registered office is St James House, Central Park, Hollinswood Road, Telford TF2 9TZ, is responsible for deciding how and why personal information is processed where it acts as the data controller. In some circumstances, another Komplex company, an NHS body, Local Authority, commissioner or professional organisation may be an independent or joint controller. We will provide further information where this applies.

A full data inventory is maintained internally and can be provided upon request.

4. Personal information we collect

The information we collect depends on your relationship with us and how you use our services. It may include:

- Identity information, including name, date of birth, age, gender and identifiers.
- Contact information, including postal address, email address and telephone number.
- Care, health and safeguarding information, including care needs, clinical details, assessments, risk information, medication information and care plans.
- Referral and commissioning information, including funding route, referrer details, package requirements, location and expected timescales.
- Recruitment and employment information, including CVs, application records, right-to-work information, DBS information, payroll and performance records.
- Communication records, including emails, calls, live-chat conversations, website form submissions and correspondence.
- Marketing preferences and records of engagement with campaigns, emails or advertisements.
- Technical and usage information, including IP address, device type, browser, operating system, approximate location derived from an IP address, referring webpage, pages viewed, timestamps, session information and interactions with the website.
- Campaign attribution information, including UTM source, medium, campaign, content and term values, referral URLs and advertising click identifiers where these are present in a website link.
- Cookie and similar technology identifiers, subject to the choices made through our cookie controls.

Health information and certain other information are classed as special category data and receive additional protection under data protection law.

5. How we collect personal information

We may collect information:

- Directly from you, including through conversations, emails, telephone calls, live chat and website forms.
- Through referrals, care assessments and the delivery of health or social care services.
- From family members, representatives, case managers, commissioners, NHS organisations, Local Authorities, health professionals, social workers, regulators and other authorised parties.
- Through recruitment platforms, job applications and employment processes.
- Automatically when you visit or interact with our websites, emails or digital advertising, using server logs, cookies, pixels, scripts, tags and analytics tools.
- From URLs containing campaign parameters, including UTM parameters and advertising click identifiers.
- From publicly available sources where it is lawful and appropriate to do so.

6. Website Forms and Forminator

Our WordPress websites use Forminator to operate contact, enquiry, referral and other online forms. The information collected depends on the form and may include names, contact details, organisation details, funding information, care needs, message content, uploaded files and other information entered by the person submitting it.

Form submissions may be stored within the website's WordPress database and may also be sent by email or transferred to authorised internal systems and staff. Forminator may record submission metadata such as the submission date, page or form used, referring URL, browser information and IP address, depending on the form and website configuration.

We use form information to respond to enquiries, assess referrals, communicate with relevant people, administer our services, maintain security, prevent spam, evidence consent where applicable and understand which campaigns or webpages generate enquiries.

Information entered into a form

The person completing a form chooses what information to submit. By sending the form, they acknowledge that Komplex will process the information provided to respond to the request and take the steps described in this policy. Information should only be submitted where the person is authorised to provide it. This acknowledgement is not used as permission for unrelated marketing.

7. Live Chat and Chatway

Our websites may use Chatway, a live-chat service operated by Poptin Ltd, to allow visitors to communicate with our team. When a person uses live chat, we may process their name, contact information, chat messages, timestamps, pages visited, referring information, IP address, browser, operating system, device information and other information generated through their use of the service.

The user decides what information to disclose through live chat. By choosing to send a message, the user acknowledges that the information supplied will be processed by Komplex and its contracted service providers so that we can understand and respond to the enquiry, direct it to the appropriate team and retain an appropriate record of the interaction.

Users should avoid providing unnecessary or excessive personal information. If a person voluntarily provides information about health, disability or care needs, we will handle it as special category data and only use it where necessary for the enquiry, referral, health or social care purpose, safeguarding, legal obligations or another lawful purpose described in this policy.

Live chat is not an emergency or clinical monitoring service and should not be used for urgent medical assistance.

8. Website Analytics, UTM Tracking and Digital Advertising

We use website analytics and campaign measurement to understand how people find and use our websites, improve content, measure advertising and identify which campaigns produce enquiries. Depending on the user's cookie choices and the technologies enabled, we may collect:

- Pages viewed, navigation paths, interactions, form starts, form submissions and other conversion events.
- Date and time of visits, session duration, referring website and exit page.
- IP address, approximate geographic area, device, browser and operating system information.
- Cookie identifiers, session identifiers and similar online identifiers.
- UTM parameters such as source, medium, campaign, content and term.
- Advertising click identifiers and information about whether an advertisement resulted in a website visit or enquiry.

UTM parameters are labels added to links to identify the campaign, platform or content that generated a visit. We may connect this attribution information with an enquiry or form submission so that we can understand how the person reached us and measure campaign effectiveness.

Where required, analytics, advertising cookies and similar technologies are activated only after the user has made a choice through our cookie consent controls. Rejecting non-essential cookies does not prevent a person from accessing the main content of our website.

9. Lawful Bases for Processing

We process personal information only where we have an appropriate lawful basis. Depending on the circumstances, this may include:

- Consent, including marketing preferences and non-essential cookies where consent is required.
- Taking steps at an individual's request before entering into a contract, or performing a contract.
- Compliance with a legal obligation, including employment, safeguarding, regulatory and record-keeping duties.
- Protection of vital interests in an emergency.
- Performance of a task in the public interest or exercise of official authority where applicable.
- Our legitimate interests, or those of another organisation, including responding to enquiries, operating and securing our websites, improving services, measuring performance and managing the business, where those interests are not overridden by individual rights.

Where we process special category data, we also identify an Article 9 condition. These may include Article 9(2)(b), (g) or (h) for employment and social protection, substantial public interest, safeguarding, or the provision and management of health or social care. Where we rely on explicit consent for a specific activity, it will be requested separately and can be withdrawn.

10. How We Use Personal Information

- Responding to enquiries and discussing services, referrals, placements or care packages.
- Assessing, planning, delivering, reviewing and safeguarding health and social care services.
- Communicating with individuals, families, representatives, case managers, commissioners and professionals.
- Managing recruitment, employment, payroll, training and workforce responsibilities.
- Operating, maintaining, protecting and improving our websites, systems and services.
- Monitoring quality, investigating complaints, managing incidents and meeting regulatory requirements.
- Measuring campaigns, website performance and the effectiveness of marketing activity.
- Sending marketing where permitted and respecting marketing and cookie preferences.
- Preventing fraud, misuse, spam, security incidents and unauthorised access.
- Establishing, exercising or defending legal claims and complying with legal obligations.

11. Who We Share Information With

We share information only where necessary, proportionate and lawful. Recipients may include:

- Authorised employees and teams within Komplex Group.
- NHS organisations, Integrated Care Boards, Local Authorities, commissioners, case managers, social workers, GPs and other health or social care professionals.
- Family members, representatives, advocates, deputies or attorneys where authorised or otherwise lawful.
- Regulators, safeguarding bodies, law enforcement, courts and public authorities where required.
- Insurers, auditors, solicitors, professional advisers and contractual partners.
- Website, hosting, communications, analytics, security, recruitment, HR, care management and other technology providers acting under contract.

We do not sell personal information. All organisations processing personal information on our behalf are subject to appropriate contractual safeguards, including Data Processing Agreements where required under UK GDPR.

12. Technology and Service Providers

We use contracted technology providers to operate our services and business. These may include:

Provider or category	Purpose
Forminator	WordPress website forms and submission management
Chatway / Poptin Ltd	Website live-chat service
WordPress and website hosting providers	Website operation, hosting, backups and security
Google Analytics, Google Tag Manager and Google Ads	Analytics, tag management, campaign measurement and advertising
Meta and other advertising platforms	Campaign delivery and measurement where enabled and consented to
GoHire	Applicant tracking and recruitment
Breathe	HR management
Xero	Finance and payroll
Care Planner and Nourish	Care management
HaloPSA	CRM and service management
Mailchimp, MailerSend or equivalent platforms	Email communications and campaign management
Metricool	Social media management and analytics
Bitwarden and security providers	Password, access and security management

Providers and products may change as our systems develop. We require suppliers to protect information and process it only for authorised purposes. A more detailed supplier and data inventory is maintained internally. This list is intended to provide transparency and may change as services evolve. The most up-to-date supplier inventory is maintained internally.

13. International Transfers

Some of our technology providers process or store personal information outside the United Kingdom (UK) or the European Economic Area (EEA). Where personal information is transferred internationally, Komplex Group takes appropriate steps to ensure it continues to receive a level of protection that is equivalent to that required under UK data protection legislation.

Before transferring personal information internationally, we undertake appropriate due diligence on the supplier and implement a lawful transfer mechanism, such as a UK adequacy regulation, the UK Extension to the EU-U.S. Data Privacy Framework (where applicable), the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses (SCCs), or another lawful safeguard permitted under UK GDPR.

Where personal information is processed by suppliers located outside the UK or EEA, we assess the nature of the information being transferred, the destination country, the supplier's technical and organisational security measures, and any additional safeguards required to protect the confidentiality, integrity and availability of personal information.

For example, Chatway customer content and live-chat data is hosted in the United States using Amazon Web Services (AWS). Where applicable, transfers of personal information rely on recognised lawful transfer mechanisms, including the UK Extension to the EU-U.S. Data Privacy Framework where the supplier maintains an active certification covering the relevant processing activities.

International data transfers are subject to ongoing review as part of Komplex Group's supplier assurance, information governance and information security processes to ensure that appropriate safeguards remain in place throughout the lifecycle of the service.

14. Cookies and Similar Technologies

Our websites use cookies and similar storage and access technologies, including pixels, scripts, tags, local storage and link or campaign parameters. These technologies help operate the website, remember choices, understand usage, measure communications and advertising, and protect the website.

Category	Purpose	Typical control
Strictly necessary	Security, consent choices, forms, requested features and core website operation.	Generally active because required for the requested service.
Functional	Remembering preferences and enabling enhanced website features.	Controlled through cookie settings where required.
Analytics	Understanding visits, navigation, engagement and website performance.	Enabled according to the user's consent choice where required.
Advertising	Measuring campaigns, attributing conversions and supporting relevant advertising.	Enabled only where the required consent has been obtained.

Users can accept, reject or manage non-essential cookies using the website's cookie consent manager. Browser settings can also be used to block or delete cookies, although doing so may affect some website features. Our cookie manager should be consulted for the current cookies and providers detected on the relevant website.

15. Data Retention

We retain personal information only for as long as necessary for the purpose for which it was collected and to satisfy legal, contractual, safeguarding, regulatory and operational requirements. Typical periods include:

- General website enquiries and contact-form records: normally up to 12 months after the last meaningful contact, unless the information becomes part of another record.
- Live-chat records: normally up to 90 days after the last interaction, unless needed for an active referral, service enquiry, complaint, safeguarding matter, legal obligation or establishment of another business record.
- Referral, assessment and care information: in accordance with the applicable health and social care record-retention requirements and contractual arrangements.
- Unsuccessful job applications: normally 12 months.
- Employment records: normally six years after employment ends, subject to specific record requirements.
- Financial and contractual records: normally at least six years.
- Analytics and campaign information: according to the configured retention period and consent settings for the relevant platform.
- Safeguarding records: according to applicable safeguarding and care record-retention requirements.

At the end of the applicable period, information is securely deleted, destroyed or anonymised. Legal holds, safeguarding requirements, complaints or claims may require information to be retained for longer.

16. Data Security

We use proportionate technical and organisational measures designed to protect personal information. These include:

- Encryption in transit and, where supported, at rest.
- Multi-factor authentication and password management where supported.
- Role-based access controls and restricted administrative access.
- Device management, monitoring and remote lock or wipe capability where appropriate.
- Backups, security testing, supplier due diligence and incident response procedures.
- Staff confidentiality obligations, training and regular review of access.

Komplex Group maintains Cyber Essentials Plus certification and implements technical and organisational security measures designed to protect the confidentiality, integrity and availability of the personal information we process. We regularly review our cyber security arrangements and, where appropriate, align our information security practices with recognised industry standards and NHS Data Security and Protection Toolkit principles.

No website or electronic transmission is completely risk free. Users should avoid sending information that is not needed and should contact us if they believe information has been sent in error.

17. Your Data Protection Rights

Depending on the circumstances, individuals may have the right to:

- Request access to their personal information.
- Request correction of inaccurate or incomplete information.
- Request erasure where the legal conditions are met.
- Request restriction of processing.
- Object to processing based on legitimate interests or direct marketing.
- Withdraw consent where processing relies on consent, without affecting earlier lawful processing.
- Request portability of information in applicable circumstances.
- Complain to the Information Commissioner's Office at www.ico.org.uk.

If you have questions about this Privacy Policy or wish to exercise any of your data protection rights, please contact:

Data Protection Officer Email: dpo@komplexgroup.co.uk

Post: Komplex Group, St James House, Central Park, Hollinswood Road, Telford, TF2 9TZ

If you remain dissatisfied, you also have the right to complain to the Information Commissioner's Office (ICO).

We may need to verify identity before responding to a request. Some rights are subject to legal limitations, and information may need to be retained where required by law, safeguarding duties, care obligations or legal claims.

18. Children and Young People

Some Komplex Group services support children and young people. Our Group websites, online forms and live-chat services provide information and allow people to make enquiries, but they are not designed to encourage children to submit personal information without appropriate support.

Where information about a child or young person is provided, it should be submitted by the young person where they are legally able to do so, or by a parent, guardian, authorised representative or professional who is permitted to share it. We treat children's information with particular care and process it only where lawful, necessary, proportionate and consistent with the child's best interests.

We recognise the rights of those with parental responsibility while also respecting the privacy rights of competent young people in accordance with applicable law.

19. Automated Decisions and Profiling

We do not use website or enquiry information to make solely automated decisions that produce legal or similarly significant effects. Where consented advertising or analytics tools are used, they may group users or visits into audiences or campaign categories for measurement and advertising. Users can manage these technologies through the cookie controls.

20. External Websites

Our websites may contain links to other websites. We are not responsible for the privacy practices of independent organisations. Users should review the privacy information provided by the relevant organisation before submitting personal information.

21. Changes to This Policy

We may update this policy to reflect changes in law, technology, suppliers or our processing activities. The current version and review date will be published on our website. Material changes may also be communicated through other appropriate channels.

Related Information Governance Documents

- This Privacy & Cookie Policy should be read alongside:
- Data Protection & GDPR Compliance Policy
- Subject Access Request (SAR) Policy
- Data Breach Response Plan
- Third Party Access & Management Policy
- Records Management & Retention Policy (where applicable)

22. Contact Us

For any questions about this policy or your data, please contact:

 enquiries@komplexgroup.co.uk

For Data Protection Enquiries: dpo@komplexgroup.co.uk

 Komplex Group, St James House, Central Park, Hollinswood Road, Telford TF2 9TZ

