

Privacy Policy

INTRODUCTION

Sagge Compliance ("we", "us", "our") is committed to protecting the privacy of everyone who uses our platform and website, including the dental practices we serve, their staff, and visitors to saggecompliance.co.uk. This policy explains what personal data we collect, why, and the rights available to you under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

WHO WE ARE

Sagge Compliance is operated by [Sagge Compliance Ltd — legal entity name] (company number [17477345]), registered in England and Wales at 73 Great N Rd, Milford Haven SA73 2ND.

THE DATA WE COLLECT

- Practice account data: practice name, address, contact names, email addresses and telephone numbers for administrators and staff registered on the platform.
- Staff HR data processed on your instructions: employment records, DBS/criminal record check outcomes, sickness and absence records, appraisal records, and other HR data stored in the HR & Management module.
- Compliance & training data: CPD course progress and certificates, compliance checklist responses, policy acknowledgements.
- Financial data: billing contact details, invoices, and (where you use the Accounting module) transaction and NHS UDA records.
- Usage data: log-in activity, IP address, device and browser information, and platform usage analytics.
- Communications: messages sent to us, and records of support requests.

Where the above includes special category data (such as health information or criminal offence data relating to your staff), you remain the controller of that data and are responsible for having a lawful basis for processing it; we process it as your processor, strictly on your instructions, as set out in our Data Processing Agreement.

HOW WE USE YOUR DATA

- To provide and maintain your account and the platform (performance of our contract with you).
- To process payments and manage your subscription (performance of a contract; legal obligation for tax records).
- To send service communications, security notices and updates (legitimate interests, including the recognised legitimate interests basis, and legal obligation where safety-critical).

- To respond to support requests (performance of a contract).
- To send marketing communications about our services, where you have opted in or under the "soft opt-in" for existing customers (consent / legitimate interests).
- To improve the platform through aggregated usage analytics (legitimate interests, or the statistical-purpose cookie exemption where applicable).
- To comply with our legal and regulatory obligations, including responding to lawful requests from authorities.

SHARING YOUR DATA

We do not sell personal data. We share data only with: sub-processors who help us run the platform (hosting, email delivery, payment processing, customer support tooling) under written contracts requiring UK GDPR-standard protections; professional advisers (accountants, solicitors, auditors) where necessary; and regulators or law enforcement where we are legally required to. A current list of sub-processors is available on request and is maintained under our Sub-processor Management Policy.

INTERNATIONAL TRANSFERS

Where any of our sub-processors store or access data outside the UK, we ensure appropriate safeguards are in place, such as the UK International Data Transfer Agreement (IDTA), an adequacy decision, or another safeguard recognised under UK GDPR.

RETENTION

We retain personal data only for as long as necessary for the purposes described in this policy, in line with our Data Retention & Disposal Policy, and in line with your instructions as controller of your practice's data.

YOUR RIGHTS

- Right of access to the personal data we hold about you.
- Right to rectification of inaccurate or incomplete data.
- Right to erasure in certain circumstances.
- Right to restrict or object to processing in certain circumstances.
- Right to data portability, where processing is based on consent or contract and carried out by automated means.
- Rights related to solely automated decision-making — we do not use fully automated decisions that produce legal or similarly significant effects on you.
- Right to withdraw consent at any time, where processing is based on consent.

HOW TO COMPLAIN

Where Sagge Compliance is the controller of your data — for example, practice administrator account data, billing contact details, and marketing enquiries — you can submit a complaint about how we handle it using our online complaints form at saggecompliance.co.uk/complaints, or by emailing compliance@saggecompliance.co.uk. We will acknowledge your complaint without undue delay and provide a substantive response in line with our Complaints Handling Policy. If you remain unsatisfied, you have the right to complain to the Information Commissioner's Office (ico.org.uk, telephone 0303 123 1113). Where a practice is the controller of the data concerned (for example, staff HR or patient-adjacent records held in the Platform), your complaint should be directed to that practice in the first instance, as we process that data only on the practice's instructions.

CHANGES TO THIS POLICY

We may update this policy from time to time. Material changes will be notified to practice administrators by email.

CONTACT US

Sagge Compliance,
73 Great N Rd, Milford Haven
SA73 2ND.
Email: compliance@saggecompliance.co.uk.