

Privacy Policy Improvement
Overview
Policy & Improvement plan

2026-27



Providing Transparency in Privacy & Data Management

1. Who We Are

Chromis UK Limited, trading as Freeway Medical / Freeway Med-Tech. Company No. 05658272. Operating address: Units 14/14a/15 & 16 Colthrop Business Park, Colthrop Lane, Thatcham, Berkshire RG19 4NB. Registered address: 12a Fleet Business Park, Sandy Lane, Church Crookham, Fleet, GU52 8BF. Privacy contact: dataprivacy@freewaymedical.co.uk | +44 (0)1635 868 191.

2. Personal Data We May Collect

Depending on how you interact with us, we may process identity and contact information; business and employment details; correspondence and enquiry information; customer, supplier and transaction records; website technical and usage information; and marketing and communications preferences. We do not intentionally collect more personal data than is necessary for the relevant purpose.

3. How We Obtain Personal Data

We obtain information directly from you through enquiries, orders, correspondence, meetings and other business interactions; automatically through our websites and permitted cookies or similar technologies; and, where appropriate, from employers, business partners, service providers and publicly available business sources.

4. Why We Use Personal Data and Our Lawful Bases

We process personal data only where we have a lawful basis. Depending on the activity, this may include performance of or steps towards a contract; compliance with a legal obligation; our legitimate interests in operating, securing and developing our business and managing customer and supplier relationships; or consent where consent is required. Where we rely on legitimate interests, we consider those interests against the individual's rights and interests.

5. Typical Purposes

Purposes may include responding to enquiries; supplying and supporting products and services; managing customer and supplier relationships; processing orders, payments and credits; maintaining business records; protecting our systems and premises; meeting legal, regulatory and audit requirements; improving our websites and services; and sending business marketing where permitted by law.

6. Marketing

We may send relevant business-to-business marketing where permitted by law. Individuals can opt out of direct marketing at any time. Where consent is the lawful basis, consent may be withdrawn at any time without affecting processing already carried out lawfully.

7. Sharing Personal Data

We may share personal data with service providers acting on our behalf, professional advisers, payment or logistics providers, business partners where necessary, and public authorities or regulators where required. We require processors to protect personal data and process it only on documented instructions, subject to applicable contractual and legal requirements.

8. Automated Decision-Making

We do not ordinarily make decisions about individuals based solely on automated processing that produce legal or similarly significant effects. If this changes, we will provide the information and safeguards required by law.

9. Data Security

We use appropriate technical and organisational measures designed to protect personal data against accidental or unlawful loss, alteration, disclosure or access. Access is restricted according to business need and security controls are reviewed in line with risk.

10. International Transfers

Our suppliers and technology providers may process personal data outside the UK. Where personal data is transferred internationally, we use a lawful transfer mechanism and appropriate protection required by UK data-protection law, such as applicable adequacy regulations or appropriate safeguards.

11. Retention

We retain personal data only for as long as necessary for the purposes for which it was collected, including legal, accounting, contractual and reporting requirements. Retention periods vary according to the nature of the information and the reason it is held.

12. Your Data Protection Rights

Depending on the circumstances and lawful basis, you may have rights to be informed; access your personal data; request correction; request erasure; restrict processing; object to processing; and receive or transfer certain data. Where processing relies on consent, you may withdraw that consent. Rights are subject to the conditions and exemptions in applicable data-protection law.

13. Cookies and Similar Technologies

Our websites use cookies and similar technologies. Non-essential technologies are managed in accordance with our Cookie Policy and applicable consent requirements. Please see the current Cookie Policy for further information and preference controls.

14. Complaints

If you have concerns about how we use personal data, please contact us first at dataprivacy@freewaymedical.co.uk so that we can investigate. You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data-protection regulator.

15. Changes to This Privacy Policy

We review this privacy information regularly and update it when our processing, legal obligations or business activities materially change. Where appropriate, significant changes will be brought to the attention of affected individuals.

16. Contact Us

Privacy enquiries and data-rights requests: dataprivacy@freewaymedical.co.uk | +44 (0)1635 868 191. Postal address: Freeway Medical, Units 14/14a/15 & 16 Colthrop Business Park, Colthrop Lane, Thatcham, Berkshire RG19 4NB.

Policy Review and Approval

Policy reviewed: 28 September 2026. Next review: September 2027, or earlier following a material change in processing or applicable requirements.

Signed on behalf of Chromis UK Ltd.



Director / authorised signatory

RENEWED 2026-27