



PRIVACY NOTICE

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1. WHO WE ARE

This privacy notice applies to personal data collected and processed by Ryminster Medical Services Limited (registered in England & Wales, Company No. 06070057), and its associated trading names and brands, including:

- D4Group;
- D4Drivers; and
- D4Health

(together referred to as 'we', 'us', or 'our' throughout this notice)

We are committed to protecting your privacy and the security of your personal data. We take care to protect the privacy of all individuals who we engage with or engage with our services and website, whether we are providing a service to you directly, where you have been referred to us by your employer, or where we have otherwise been in contact through email, by phone, via our website or in person at our offices/clinic locations.

We have developed this privacy notice to inform you of the data we collect, what we do with it and what we do to keep it secure, as well as the rights and choices you have over your personal data.

We may provide additional privacy notices to you in certain specific circumstances at the time we collect your data. For example, we provide additional privacy information to our employees or prospective job applicants when they apply for a job with us. Such notices will govern how we process the information you provide at that time.

Throughout this document we refer to Data Protection Legislation, which means the Data Protection Act 2018, United Kingdom General Data Protection Regulation, the Data (Use and Access) Act 2025, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. This includes any replacement legislation coming into effect from time to time.

1.1 Data Controller

Regardless of which brand you interact with, Ryminster Medical Services Limited is the Data Controller responsible for your personal data as outlined in this privacy notice.

We are registered with the Information Commissioner's Office (the ICO) with registration number Z3227872.

Where your employer has instructed us to carry out a medical or assessment on their behalf, your employer will be a controller for any information shared by/with them as part of the services and we may either be an independent controller or processor depending on the service being provided and what our own obligations are in managing your personal data. For example, we will be a controller should we need to fulfil duties of medical confidentiality, maintain clinical records, manage medical consent or report to regulatory bodies. You should refer to your organisation's privacy notice for full details on how they process personal data relating to you.

1.2 Data Protection Officer

We have appointed The DPO Centre Ltd as our Data Protection Officer (DPO) to help us monitor internal compliance, inform, and advise on data protection obligations, and act as a point of contact for data subjects and the ICO. For further details on how you can contact us or our DPO, please see the [contact us](#) section below.

1.3 Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. Historic versions can be obtained by contacting us.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your information changes during your relationship with us.

1.4 Third-party links

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy practices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

1.5 Children

While our websites are designed for a general audience, we will not knowingly collect any data from children under the age of 13 or sell services to children. If you are under the age of 18, you are not permitted to register an account, use or submit your data to the website.

If we discover that we have collected any personal information from a child under the age of 18, we will suspend the associated account and remove that information from our database as soon as possible.

If you believe we might have any personal information from or about a person under the age of 18, please email us using the contact details below.

2. INFORMATION WE COLLECT ABOUT YOU

Personal data, or personal information, means any data about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, title, marital status, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account details and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products, and services.

- **Correspondence Data** includes the content of your communications with us, to the extent this fits the definition of personal data.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Image and Audio Data** includes photographs, CCTV footage, call recordings.
- **Health and Medical Data** includes health information that forms part of a medical appointment or occupational health assessment, as relevant to the services that we are providing. This could relate to your physical or mental health, past and current medical history, medication, visual acuities, blood pressure readings, alcohol consumption and whether you passed or failed a medical assessment (where relevant). This may encompass other sensitive data if there is necessary clinical reason to collect it, such as your ethnicity.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy notice.

2.1 If you fail to provide personal information

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR INFORMATION

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Correspondence, Health and Medical , Marketing and Communication and Financial Data by filling in forms or by corresponding with us by post, phone, email, online chat or via a digital or in-person appointment. This includes personal data you provide when you:
 - Book an appointment
 - Attend an appointment with one of our clinicians
 - Request marketing to be sent to you
 - Request help or support
 - Give us feedback or otherwise contact us
- **Your employer.** When a referral is made from your employer we will may obtain Identity and Contact, as well as Health and Medical data depending on the service in question, from them in order to facilitate our services and may contact you to arrange an appointment.
- **Automated technologies or interactions.** As you interact with our website, we may, subject to your engagement with our cookie banner, automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie banner for more information.

If you visit our office or take part in a recorded phone or video call with us, your Image and Audio Data may be collected.

- **Third parties.** We may receive personal data about you from the third parties with which we engage, see section 5 of this notice.

4. HOW WE USE YOUR INFORMATION

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation (e.g. Health and Safety Executive guidance, HMRC rules, requests from a legal body)
- Where we do not have a contractual obligation, legitimate interest or legal obligation we may ask for your consent in limited circumstances.

4.1 Sensitive information

Your Health and Medical Data is considered special category data under Data Protection Legislation and is therefore subject to additional requirements. We will only use these types of data where, in addition to having either a contractual obligation, legitimate interest, legal obligation or you consent above, we have:

- The provision of preventative or occupational medicine, for the assessment of the working capacity of the employee.
- Where the above does not apply, we may rely on explicit consent in limited circumstances

4.2 Consent

For our medical and health services, we do not rely on consent or explicit consent as a basis for processing your personal data routinely. This applies in particular where you have been referred to us by your employer, as our services may constitute a requirement of your employment and we cannot guarantee service provision or no detriment to you in the event of consent withdrawal. This basis will therefore only be relied on in rare circumstances, by exception, and you will be notified of this prior to processing.

As a provider of clinical services, we do seek your clinical consent (as defined by General Medical Council guidance) to referral, assessment and subsequent production and sharing of our reports. This does not constitute consent to processing, as defined by Data Protection legislation.

4.3 Purposes for which we will use your personal data

We have set out below, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data, where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data 	Either performance of a contract with you or necessary for our legitimate interests to set you up as a customer at your request

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To book your appointment	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data • Health and Medical Data (in limited circumstances if needed at the booking stage) 	<p>Either performance of a contract with you or necessary for our legitimate interests to process a booking at your or your employers request</p> <p>See also Sensitive information heading above</p>
To provide our medical services to you, as requested by you directly, including the provision of any certificates or reports, and maintenance of clinical records	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data • Health and Medical Data • Image and Audio (if online appointment – not stored/recorded) 	<p>Either performance of a contract with you, to fulfil our legal obligations, or as necessary for our legitimate interests to fulfil your appointment</p> <p>See also Sensitive information heading above</p>
<p>When providing our medical services to you, as per a referral from your employer, we will process your data for our own purposes where necessary to:</p> <ul style="list-style-type: none"> • Fulfil duties of medical confidentiality • Maintain clinical records • Manage clinical/medical consent • Report to regulatory bodies 	<ul style="list-style-type: none"> • Identity • Contact • Health and Medical • Image and Audio (if online appointment – not stored/recorded) 	<p>To comply with our legal obligations and legitimate interests in complying with good clinical practices</p> <p>See also Sensitive information heading above</p>
Where you have provided your clinical consent, to provide information to your employer regarding the outcome of a medical, provision of a certificate, your fitness to work or information relating to other services that they have referred us to provide to you	<ul style="list-style-type: none"> • Identity • Contact • Health and Medical <p style="text-align: center;">and</p>	<p>To comply with our legal obligations and legitimate interests in complying with good clinical practices</p> <p>See also Sensitive information heading above</p>
<p>To understand the way you use our services:</p> <ul style="list-style-type: none"> • Identify products/services that may be of interest to you • Monitor usage of websites • Send service messages • Personalise our service • Conduct statistical analysis and research • Improve our services • Develop new services 	<ul style="list-style-type: none"> • Identity • Contact • Technical • Profile • Usage 	<p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To process payments for our services, including managing payments, fees and charges and to collect and recover money owed to us	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction 	Either for the performance of a contract with you, where necessary to comply with our legal obligations or where necessary for our legitimate interests (to recover debts due to us)
To contact you, following your enquiry, or reply to any questions, suggestions, issues. We may process this information when you communicate with us whether in person, through our website, via email, over the phone, or via any other medium.	<ul style="list-style-type: none"> • Identity • Contact • Marketing and Communications • Image and Audio • Health and Medical (where disclosed by you) 	<p>To meet our legitimate interests (to provide a complete and in some cases, better service)</p> <p>Occasionally we may rely on your consent</p> <p>See also Sensitive information heading above</p>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data, and anti-money laundering checks).	<ul style="list-style-type: none"> • Identity • Contact • Technical 	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) and occasionally as necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Usage 	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you. We will pro may opt-out of receiving such recommendations	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Marketing and Communications 	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p> <p>Occasionally we may rely on your consent</p>
Comply with applicable laws, lawful requests, and legal process, where appropriate/necessary	This may be any data category depending on the request, but we will always follow the principles of data minimisation and purpose limitation when managing data for these purposes.	<p>Necessary to meet our legal obligations</p> <p>See also Sensitive information heading above</p>
Comply with regulatory monitoring and reporting obligations, where appropriate/necessary	This may be any data category depending on the request, but we will always follow the principles of data minimisation and purpose limitation when managing data for these purposes.	<p>Necessary to meet our legal obligations.</p> <p>See also Sensitive information heading above</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Monitor calls for training and quality purposes. Note: recordings paused when taking payments over the phone and no recordings of medical appointments	Image and audio	Necessary for our legitimate interests (to maintain and improve the quality of our services)
To maintain the physical security of our offices and safety of staff and visitors	Image and audio	Necessary for our legitimate interests (to maintain security and safety)

4.4 Keeping you updated

We may contact you as outlined above, or send you relevant news about our services in a number of ways, but only where we have a legitimate interest or your consent, as applicable, for doing so. Such communications may be deemed marketing, while others may be service messages (e.g. a reminder that a D4 medical renewal is approaching). All such communications will be sent from our domain.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Third-party marketing - we will not share your information with any third parties for the purposes of direct marketing.

Opting out - you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Cookies – You can set your cookie preference when you first visit our websites via our cookie banner. You can review and customise your cookie preferences thereafter by clicking on the cookie logo in the bottom left of our settings at any time by visiting our websites. Our cookies are classified as necessary, functional, analytics, performance or advertisement. Necessary cookies are always active, but all other cookies will only be placed with your consent. For more information about the cookies we use and their duration, please navigate to our cookie banner as described above.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose - we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. WHO WE SHARE YOUR INFORMATION WITH

There are certain circumstances where we transfer your personal information to other parties.

We share your information with certain contractors or service providers. They may process your personal data for us, for example, and include clinicians, IT suppliers, database providers, backup and disaster recovery specialists, and email providers.

Category of third party	Purpose	Locations & Transfer Mechanisms (if required)
Clinicians	Clinicians carry out medical assessments on our behalf. We share data with them to facilitate appointments, and they share data back with us to fulfil our services. This will include Identity, Contact and Health and Medical Data.	All in the UK.
Venues for medical assessments	Should you book an assessment at one of our third-party venues, the venue will receive a list of appointments containing minimal Identity and Contact Data.	All in the UK.
Databases	We utilise several databases to store and manage personal data for different purposes. For example, we use a customer relationship management database, and also databases for the booking and maintenance of our services. Depending on the function of our databases, they may contain any of the data categories mentioned in section 2.	All hosted in the UK, with the exception of one of our databases which is hosted in Ireland. The ICO recognises Ireland as meeting the necessary standards and conditions for such transfers (referred to as “adequacy” criteria).
IT and technology support	To maintain our systems, networks and databases, IT and tech support teams may gain incidental access to your data.	Our tech support is provided from the UK, or, where the solution is provided by a third party, from where the third party is based. Our agreements with third parties will have appropriate contractual clauses in place where necessary.
Payment processors	We engage with payment processors to manage payments on our behalf.	All UK.
Email and communication providers	We utilise various platforms to ensure communications between us remain fluid and that we are accessible to you. This includes email, phone and online chat functions. These platforms will host data and provide technical support.	UK, with the exception of our online chat function, which is hosted in the US. We have a DPA with standard contractual clauses in place.
Cookie and analytic providers	Full information on our use of cookies can be found by clicking the icon in the bottom left of our website.	In some instances, the parent company of the analytic providers that we engage with will be based in the US. In such instances, we select preferences to avoid sharing of personal data between those providers and parent companies. In any case, we enter into agreements to ensure that standard contractual clauses protect such transfers.
Professional advisers	We may need to share personal data with lawyers, bankers, auditors, and insurers where necessary in the course of the services they render to us.	All UK based.

Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function. They will not be permitted to use your information for any purposes other than those outlined in this privacy notice.

Your personal information may be transferred to other third party organisations in certain scenarios:

- If we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality
- If we are reorganised or sold, information may be transferred to a buyer who can continue to provide services to you.
- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police.
- If there is an emergency which requires us to share your data to protect your health and safety or the health and safety of others/the general public.

Your personal data may also be shared with third parties if it is made anonymous and aggregated. In such circumstances the information will cease to be personal data.

6. WHERE WE PROCESS YOUR DATA

We are based in the UK and so are most of the third-party organisations that we engage with (as per section 5 above), which means your data largely remains in the UK. Should we engage with a third party based outside of the UK and the third party receive, host or access your data, this will constitute an international transfer of your data. Where such a transfer is made to countries not deemed by the ICO to provide an adequate level of personal information protection, the transfer will be based on safeguards that allow us to conduct the transfer in accordance with the Data Protection Legislation, such as the specific contracts approved by the ICO providing adequate protection of personal information. For more information on the scope of any international transfers, please contact us using the details below.

7. HOW WE PROTECT YOUR INFORMATION

The security of your data is of the utmost importance to us. We have put in place appropriate physical, electronic and managerial security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We use appropriate procedures and technical security measures (including pseudonymisation, strict encryption and archiving techniques where proportionate) to safeguard your information across all our computer systems, networks, websites and offices.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. HOW LONG WE RETAIN YOUR INFORMATION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the

purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including some Contact, Identity, Financial and Transaction Data) for 6 years after they cease being customers for tax purposes.

Depending on the service being provided and the nature of our relationship with you, we may need to maintain some health and medical records for longer periods of time. For example, we retain general occupational health records and driver medical records for 8 years, however, where there has been exposure to long-latency disease, we need to retain records for 40 years.

Sometimes we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Please contact us using the details in this notice if you require more detail on our retention practices.

9. YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Request access to your personal data:** You can request a copy of the personal data that we hold about you, sometimes referred to as a “Data Subject Access Request” or a “DSAR”. You are also entitled to supplementary information, including the data source, purposes of the processing, retention periods and any disclosures.
- **Request correction of your personal data:** If you believe any personal data that we hold is inaccurate, incomplete or out of date, you may ask us to rectify it.
- **Request erasure of your personal data:** Also known as “the right to be forgotten”, you can ask us to delete your personal data in certain circumstances.
- **Object to processing of your personal data:** You can object to how we are using your personal data in certain circumstances – for example where we are relying on our legitimate interests for the processing.
- **Request restriction of processing your personal data:** You can ask us to stop using your data for a certain purpose. For example, you may want us to temporarily stop using your data for one purpose, but would still like us to process your data for other purposes.
- **Request transfer of your personal data:** Known as the right to data portability, in certain circumstances you can request that we provide your personal data to you in a structured, commonly used, and machine readable format, or otherwise transmit this to another controller directly.
- **Right to withdraw consent:** Should we be relying on your consent for the processing of your personal data, you can withdraw such consent at any time, either through the channel you requested it, or via the email below.

If you wish to exercise any of the rights set out above, please contact us using dpo@d4group.uk.

9.1 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

9.2 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.3 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. HOW TO CONTACT US OR MAKE A COMPLAINT

If you have any questions about this privacy notice or our privacy practices, please contact our DPO at dpo@d4group.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have. Should you wish to raise a complaint with us, you can do so by either contacting us using the contact details in this privacy notice or by completing our [Data Protection Complaint Form](#). We are required by law to acknowledge your complaint within 30 days, but will likely do so much sooner and will respond without undue delay.