



## Advo Health Privacy Notice

**Version:** 3.1

**Last updated:** January 2026

### Introduction

At Advo Health Limited, your privacy is important to us. We are committed to protecting and safeguarding your personal data and respecting your data protection rights. This Privacy Notice explains how we collect, use, store, share and protect your personal data when you:

- Use our services
- Contact us or communicate with us
- Visit or interact with our website

This notice explains:

- Who we are and the laws under which we are governed
- The scope of this notice and when other notices apply
- What information we collect about you
- How and why we use your personal information
- The lawful bases we rely on to process your data (with a detailed table)
- Who we share your information with
- International transfers
- How long we keep your information (with key periods)
- How we keep your personal data safe
- Your individual data protection rights and how to exercise them
- How to raise a concern or complaint

### Scope

This Privacy Notice applies when **Advo Health Limited** acts as a **data controller**—for example in relation to:

- Our websites and online portals
- General enquiries, quotes and bookings managed directly by Advo Health
- Service communications and administration
- Complaints, incidents and safeguarding concerns handled by Advo Health
- Supplier and stakeholder management, and business operations



This Privacy Notice **does not** apply where Advo Health delivers services on behalf of another organisation as a data processor. For example, where we conduct Personal Independence Payment (PIP) or Work Capability Assessments (WCA) for the Department for Work and Pensions (DWP), DWP is the data controller and the <https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter> applies. If you wish to exercise your data protection rights in relation to information processed for PIP or WCA, please contact the DWP directly using their published routes.

## Who We Are and Our Regulatory Responsibilities

Advo Health Limited is a provider of health and disability assessment services and related administration, governance and quality assurance activities.

- **Registered office:** Carnac House, Cams Hall Estate, Fareham, Hampshire, PO16 8UZ
- **Company number:** 15742346

For the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, Advo Health Limited is a **data controller** in respect of the personal data described in this notice (when acting in its own right as described in the Scope section above).

Advo Health Limited forms part of the **Ascenti Group**. This Privacy Notice applies only to Advo Health Limited. Information about how other group companies process personal data is available on their respective websites.

## Our Data Protection Officer

We have appointed an external Data Protection Officer to oversee compliance with our data protection obligations. The Data Protection Officer covers all organisations within the Ascenti Group.

- **Data Protection Officer:** The DPO Centre Limited
- **Email:** [dpo@ascenti.co.uk](mailto:dpo@ascenti.co.uk)

## What Information Do We Collect?

### Personal Information

We may collect and process personal information about you, including:

- Name, address and contact details
- Email address and telephone number
- Service-related information (e.g. appointments, communications and outcomes for assessments provided directly by Advo as controller)
- Information contained within correspondence, complaints or enquiries
- IP address and information about how you use our website



## **Special Category Personal Data**

In certain circumstances, particularly where we are dealing with assessments that involve health information, or managing safeguarding matters, we may process special category personal data, including:

- Information relating to health
- Safeguarding information
- Incident and complaint-related information

## **Website and Technical Information**

When you visit our website, we may collect information about how the website is accessed and used. This may include browser type, device information, IP address and usage data. Further details are available in the **Ascenti Group Cookie Policy**

## **How Do We Collect Your Information?**

We collect information when you:

- Contact us by telephone, email, post or other correspondence
- Submit enquiries via our website or online portals
- Book and attend assessments we provide as controller
- Engage with us in the course of our business activities
- Raise a complaint, concern or safeguarding issue

We may also receive information about you from third parties, where lawful and appropriate, such as instructing organisations, auditors or public authorities.

## **How Do We Use Your Information?**

We use your personal information to:

- Respond to enquiries and requests for information (including quotes)
- Schedule and deliver health and disability assessments where Advo is the data controller
- Provide service-related communications (appointment confirmations, reminders, results notifications)
- Maintain accurate records
- Manage complaints, incidents and safeguarding concerns
- Audit and monitor our services and websites
- Comply with legal, regulatory and contractual obligations
- Improve our services, systems and website



We do **not** use your personal data to make decisions based solely on automated processing.

**Note:** Where Advo Health delivers assessments **as a processor** for the DWP (e.g. PIP or WCA), the DWP’s privacy notice applies and DWP determines the purposes and lawful bases for processing. See the **Scope** and **DWP-specific information** sections for details.

### How Do We Lawfully Use Your Information?

Under the UK GDPR, we must have a lawful basis to process your personal data.

#### Article 6 Lawful Bases

We rely on one or more of the following lawful bases:

- **Contract (Article 6(1)(b))** – where processing is necessary to take steps at your request prior to entering into a contract, or to perform a contract with you (e.g. delivering an assessment where Advo is the controller)
- **Legal obligation (Article 6(1)(c))** – where processing is necessary to comply with a legal or regulatory obligation (e.g. record keeping, responding to regulators)
- **Legitimate interests (Article 6(1)(f))** – where processing is necessary for our legitimate interests and those interests are not overridden by your rights (e.g. service quality monitoring, security and fraud prevention, handling general enquiries)
- **Consent (Article 6(1)(a))** – where you have given clear consent for a specific purpose (e.g. certain optional communications)
- **Vital interests (Article 6(1)(d))** – where processing is necessary to protect life or health, including safeguarding situations

#### Processing Special Category Data (Article 9)

Where we process special category personal data, we rely on one or more of the following **Article 9** conditions:

- **Article 9(2)(h)** – health or social care purposes (e.g. delivering an assessment where Advo is the controller)
- **Article 9(2)(b)** – safeguarding of individuals at risk
- **Article 9(2)(f)** – establishment, exercise or defence of legal claims

#### Lawful Basis Table

Purpose	Article 6 UK GDPR lawful basis	Article 9 UK GDPR condition (if applicable)	Advo’s role
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Responding to enquiries, requests for information and providing quotes	Article 6(1)(f) – Legitimate interests (responding to enquiries and operating our business) <i>and, where applicable,</i> Article 6(1)(b) – Steps prior to entering into a contract	Not applicable	Data Controller
Scheduling and delivering health and disability assessments where Advoca Health acts in its own right	Article 6(1)(b) – Performance of a contract	Article 9(2)(h) – Health or social care purposes	Data Controller
Service-related communications (e.g. appointment confirmations, reminders, results notifications)	Article 6(1)(f) – Legitimate interests (necessary for service delivery and administration)	Not applicable	Data Controller
Maintaining operational, administrative and service records	Article 6(1)(c) – Legal obligation and/or Article 6(1)(f) – Legitimate interests	Article 9(2)(h) – Health or social care purposes (where health data is involved)	Data Controller
Managing complaints, incidents and safeguarding concerns	Article 6(1)(c) – Legal obligation and/or Article 6(1)(f) – Legitimate interests and, where necessary, Article 6(1)(d) – Vital interests	Article 9(2)(b) – Safeguarding of individuals at risk and/or Article 9(2)(f) – Legal claims	Data Controller
Quality assurance, audit, supervision and service improvement	Article 6(1)(f) – Legitimate interests (maintaining service quality, governance and compliance)	Article 9(2)(h) – Health or social care purposes (where applicable)	Data Controller
Optional marketing communications	Article 6(1)(a) – Consent	Article 9(2)(a) – Explicit consent (where special category data is involved)	Data Controller
<b>Delivery of Personal Independence Payment</b>	Lawful bases determined by the	Conditions determined by the	<b>Data Processor</b> (acting on DWP's



<b>(PIP) and Work Capability Assessments (WCA) on</b>	<b>DWP</b> (typically Article 6(1)(e) – Public task)	<b>DWP</b> (e.g. Article 9(2)(h))	documented instructions)
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### Who Do We Share Information With?

We do **not** sell your personal information.

Where lawful and necessary, we may share your personal data with:

- Other companies within the Ascenti Group
- Instructing organisations, insurers or solicitors (where relevant)
- Auditors and professional advisers
- Public authorities, regulators or law enforcement agencies
- Statutory and safeguarding bodies
- Trusted suppliers who support our business operations (IT, hosting, communications, security, archiving and storage)

We share only the minimum amount of information necessary and ensure appropriate contractual safeguards are in place. Where professional duties of confidentiality apply, we will obtain consent where required.

### Safeguarding

Advo Health is committed to safeguarding adults and children. Where a safeguarding concern is identified, we may process and share personal data to protect individuals at risk.

Processing for safeguarding purposes is carried out under:

- **Article 6(1)(d)** – vital interests
- **Article 6(1)(e)** – public task (where relevant)
- **Article 9(2)(b)** and **Article 9(2)(h)** where special category data is involved

Information shared in safeguarding situations is limited to what is necessary and proportionate.

### International Transfers

We do not routinely transfer personal data outside the United Kingdom (UK) or the European Economic Area (EEA). Where an international transfer is required, we ensure it is protected by appropriate safeguards, such as:

- UK adequacy regulations
- The UK International Data Transfer Agreement (IDTA)
- The UK Addendum to the EU Standard Contractual Clauses



We also carry out transfer risk assessments and apply additional technical and organisational measures where required (e.g. encryption, access controls, logging and monitoring).

### **How Long Do We Keep Your Information?**

We retain personal data only for as long as necessary, taking into account legal and regulatory requirements, limitation periods for legal claims, professional guidance and operational needs. Key periods are:

**Note:** Where services are delivered **for the DWP** (e.g. PIP/WCA), **DWP determines retention** and holds the core assessment record as controller. Any Advo-held processing is carried out on DWP's instructions and in line with DWP retention requirements.

### **How We Keep Your Information Safe**

We use appropriate technical and organisational measures to protect personal data, including:

- Secure systems and networks
- Encryption and role-based access controls
- Staff training and confidentiality obligations
- Supplier due diligence and contractual controls
- Regular review and testing of security practices

### **Use of Cookies**

Our website uses cookies to improve functionality and user experience. More information is available in the **Ascenti Group Cookie Policy**.

### **Exercising Your Data Protection Rights**

You have the following rights under UK data protection law:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (in certain circumstances)
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision-making and profiling

### **How to Exercise Your Rights**



To exercise your data protection rights relating to **Advo Health as controller**, please contact:

- **Subject access requests:** SAR@ascenti.co.uk
- **All other rights requests:** dpo@ascenti.co.uk

There is no fee for making a request. We will respond within one month, subject to identity verification. Where data has been deleted from live systems, it may remain securely stored in backup systems for a limited period until it is routinely overwritten.

### **DWP-specific information (PIP/WCA)**

If your assessment relates to **PIP** or **WCA**, please contact the **DWP** to exercise your data rights regarding assessment information. Useful links:

- **DWP Personal Information Charter (Privacy Notice):**  
<https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>
- **Request your personal information from DWP:**  
<https://www.gov.uk/guidance/request-your-personal-information-from-the-department-for-work-and-pensions>
- **DWP Information Rights Request Form:** (as published by DWP) – please refer to DWP guidance and forms via the link above or through your DWP correspondence.

If you send a DWP-related request to us, we will forward it to the DWP; however, it is usually quicker to contact the DWP directly in the first instance.

### **Concerns and Complaints**

If you have concerns about how we handle your personal data, please contact our Data Protection Officer:

- **Email:** dpo@ascenti.co.uk

You also have the right to raise a complaint with the Information Commissioner's Office:

- **Website:** <https://www.ico.org.uk/concerns>

We encourage you to contact us first so we can try to resolve your concern promptly.

### **Changes to This Privacy Notice**

We may update this Privacy Notice from time to time. The latest version will always be available on our website.