

# Privacy Policy

## CliniSys Website Privacy Policy

### Version 1.4

#### Document Information

**Prepared for:** Users of the CliniSys Website

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**Date:** 30 August 2018

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## Legal Information

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## Statement of Confidentiality

In preparing this document, CliniSys has included certain proprietary information containing certain business and trade secret information, which is provided commercially in confidence to the named recipient(s) alone. By creating this document, CliniSys does not waive any of its rights to maintain confidentiality of such information. The passing of this document or the disclosure of its content to any third party, outside of the recipient's authority, without express permission from CliniSys is prohibited.

CliniSys acknowledges that the Authority may be bound by the Freedom of Information Act 2000 (FOIA). CliniSys considers that the contents of this document are confidential and exempt from disclosure pursuant to section 41 of the FOIA. The Authority should consult CliniSys before making any disclosure of information relating to CliniSys under the FOIA.

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## 1. Privacy Statement

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Your privacy is important to us. This Privacy Policy describes our practices with respect to (i) the personal information we gather on our website (ii) the way we use personal information internally; and (iii) our policy regarding sharing your personal information with others.

We are committed to processing your information in accordance with international legal standards, including the General Data Protection Regulation (GDPR) and other applicable data protection laws and data protection codes of conduct. We have implemented the practices set out in this Privacy Policy for our website and dependent pages (the "Site"). We have instructed our website administrator to include information regarding these privacy practices anywhere on the Site where Personal Information is collected.

This policy addresses our privacy practices relating to visitors to the Site and registered users of the Site. For purposes of this Privacy Policy, "Personal Information" means any information that, by itself or in combination with other information, identifies or can reasonably be used to identify an individual, such as name, email address, IP address, telephone number, address, billing information or date of birth. Personal Information does not include information that is anonymised, or publicly available information. The term "Processing" means any operation or set of operations which is performed on Personal Information, whether or not by automated means, such as collection, use, organisation, storage, alteration or destruction, disclosure, or transfer.

### 1.1 Declaration of Consent

**By submitting Personal Information and other information to the Site, you consent to the Processing of such information in accordance with the terms of this Privacy Policy.**

You may withdraw this consent at any time by notifying us at [enquiries@clinisys.co.uk](mailto:enquiries@clinisys.co.uk), or by writing to The Data Protection Officer, CliniSys, Two Bridges, Guildford Street, Chertsey, Surrey KT16 9AU.

### 1.2 Collecting Company Information

Generally, you may browse the Site without providing any Personal Information. However, we may ask that you provide information, including, without limitation, Personal Information, at various times and locations through the Site. For example, if you decide to register with the Site to request information, you will be asked to provide information such as your name and email address. When using forms on the Site to communicate with us, you may choose to provide other Personal Information, such as your name, company name, mailing address, phone number, and email address. We may collect and store any Personal Information you input into the Site.

### 1.3 Protecting Personal Information

We take commercially reasonable steps to protect your Personal Information when you transmit it from your computer to the Site and to protect such information from loss, misuse, unauthorised access, disclosure, alteration, or destruction. You should keep in mind that no Internet transmission is ever 100% secure or error-free. In particular, e-mail sent to or from the Site may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. Where you use passwords, ID numbers, or other special access features on this site, it is your responsibility to safeguard them.

Under no circumstances should sensitive data such as patient unique identifiers or patient demographics be transmitted to the Site.

## 1.4 How We Use Personal Information

The Personal Information collected by and through the Site may be used by CliniSys Solutions Limited, its divisions, holding companies, subsidiaries and affiliates, or other entities that are involved in the operation of the Site. We may use the information collected and provided, individually or in an aggregate form, in order to:

- contact you about the Company;
- evaluate products or services we could offer to you;
- monitor or improve use of the Site;
- compare and otherwise use data entered by users for any purpose including consulting, research and marketing;
- customise any advertising and content you see on the Site;
- provide specific information to you from us and/or our affiliates; and
- send you promotional material / newsletters / conference invites from us and/or our affiliates.

This list is not exhaustive but any use of personal information will be deemed relevant to users of the Site or to fulfil our business needs.

We do not sell Personal Information about you to unrelated companies for their independent use.

## 1.5 Corrections & Requests for Personal Information or Erasure of Personal Information

If you want us to correct your Personal Information or other information, or if you would like us to provide you with a copy of the Personal Information that we hold about you, or if you would like the Personal Information that we hold about you to be erased, please contact us by sending us an email to [enquiries@clinisys.co.uk](mailto:enquiries@clinisys.co.uk) or writing to the Data Protection Officer at CliniSys, Two Bridges, Guildford Street, Chertsey, Surrey KT16 9AU.

## 1.6 Personal Information Retention

Personal Information will be stored for as long as the information is required to fulfill our legitimate business needs or the purposes for which the Personal Information was collected, or for such period as is required by law.

## 1.7 Data Transfers to Countries Outside the EU/EEA

Your data may be used (see previous section “How We Use Personal Information”) by the Company and its divisions, holding companies, subsidiaries and affiliates, or other entities outside the European Union (EU) and the European Economic Area (EEA) including in the U.S. Please note that in countries outside the country in which you live, and in particular, outside the EU/EEA, a different standard of data protection might apply than the standard that you are used to in your own country. By completing and submitting the contact form on our website, you acknowledge and consent that data will be transferred across international borders, including to countries outside the EU/EEA.

## 1.8 Disclosing Personal Information to Third Parties

Any Personal Information that you provide to us will be used for our purposes only. Personal Information will not be shared with individuals or other companies other than those referred to in this Privacy Policy.

In some instances, however, we may need to provide Personal Information to third parties that we use to deliver specific products or services to you (such as shipping or direct mailing organisations). In such cases, our agreements with these third parties do not permit them to use Personal Information for purposes other than fulfilling those services or allow such third parties to further disclose your Personal Information.

## 1.9 Domain Name and IP Address

We collect the domain names and IP addresses of our visitors for statistical purposes, to measure use, to improve the content or responsiveness of the Site, or to customise the content or layout of the Site for the individual visitor. We do not disclose this information to third parties. We may also aggregate information relating to our visitors' traffic patterns from the data that we collect and retain concerning the IP addresses and domain names of our visitors, and we may divulge such aggregate information about our users with third parties such as our business partners, distributors, and service and support providers.

## 1.10 Log Files

We maintain a log file of all actions that are initiated or facilitated using the Site, to capture, record and store data concerning the transaction. Access to this data is restricted to those who administer our network and public website, except that we may use and disclose this information to third parties in response to legal process or law enforcement inquiries, abuse of our website, or violation of any applicable Terms of Use or contractual provision you may have with us.

## 1.11 E-Mail Addresses

You should know that e-mail is not necessarily secure against all forms of interception. If your communication includes sensitive information about your company and you would prefer not to transmit this information in this fashion, please contact us by post or telephone rather than e-mail.

We collect email addresses that are: volunteered by the visitor; through e-mail messages addressed to us or our employees; through visitor responses via the "contact us" portion of the Site; or e-mail marketing destination web pages and public events. We use e-mail addresses for marketing purposes and to inform those interested in our products about events, products, services or other items of interest. We may also use e-mail addresses volunteered by our visitors to register the visitor for an extranet account, to process orders for brochures and other written materials, or otherwise to respond to a visitor's request.

You may opt-out of receiving promotional or marketing emails at any time by clicking the relevant check box, notifying us as a reply to any unwanted e-mail, contacting us at [enquiries@clinisys.co.uk](mailto:enquiries@clinisys.co.uk), or by writing to the Data Protection Officer at CliniSys, Two Bridges, Guildford Street, Chertsey, Surrey KT16 9AU.

## 1.12 Third-Party Sites

The Site may contain links to other third-party sites. When you click on one of these links you are visiting a website operated by someone other than us and the operator of that website may have a different privacy policy. We are not responsible for their individual privacy practices, so we encourage you to investigate the privacy policies of such third-party operators.

## 1.13 Children

Our website is not intended for children under 13 years of age. We do not knowingly collect Personal Information from children under 13. If you are under 13, do not access, use, or provide any information on the Site or on or through any of its features. If we learn we have collected or received Personal Information from a child under 13 without parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us by sending us an email at [enquiries@clinisys.co.uk](mailto:enquiries@clinisys.co.uk) or writing to the Data Protection Officer at CliniSys, Two Bridges, Guildford Street, Chertsey, Surrey KT16 9AU.

## 1.14 Data Breaches

Whilst every effort and measure is taken to reduce the risk of data breaches, we have dedicated controls and procedures in place for such situations, along with the procedures that are required to make notifications to the relevant Supervisory Authority and data subjects (where applicable).

## 1.15 Website Cookies

The CliniSys website uses cookies; small text files that are placed on your machine to help improve the user experience. The CliniSys website also uses third party cookies, which are placed by software that we use and by software operated by third parties whose services we use, such as Google, Adobe and YouTube.

Your data may also be transferred to the USA. For example, Google LLC, based in the USA, is certified for the US European data protection agreement "Privacy Shield", which guarantees compliance with the data protection level applicable in the EU.

Most browsers allow you to disable all cookies, third party cookies only and also to delete those that have been placed on your computer. However, if you do so please be aware that you may not be able to use all the features on our website.

## 1.16 Comments and Questions

We welcome comments and questions regarding this Privacy Policy. Any such questions should be directed via e-mail to [enquiries@clinisys.co.uk](mailto:enquiries@clinisys.co.uk). Additionally you may make your request in writing to the Data Protection Officer at CliniSys, Two Bridges, Guildford Street, Chertsey, Surrey KT16 9AU.