

PRIVACY POLICY

1 IMPORTANT INFORMATION AND WHO WE ARE

1.1 KeepMeWell Ltd (**we, us, our**) respects your privacy and is committed to protecting your personal data. This privacy notice sets out how we collect and process your personal data when we provide goods and / or services to you, when you communicate with us or when you visit our website or any other associated websites and applications under our control (**websites**) and tells you about your privacy rights and how the law protects you.

1.2 It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

1.3 If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us in the following ways:

Email: info@device-link.com

Address: Mha House Charter Court, Phoenix Way, Swansea Enterprise Park, Swansea, United Kingdom, SA7 9FS

1.4 You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority 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.

2 CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

2.1 We reserve the right to update and change this privacy notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. In case of any changes, we will publish the changed privacy notice on our websites and may publish or bring it to your attention by other means. The changes will take effect as soon as they are posted on our website.

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

3 PERSONAL DATA ABOUT OTHER PEOPLE WHICH YOU PROVIDE TO US

- 3.1 If you provide personal data to us about someone else (directors or employees, or someone with whom you have business dealings) you must ensure you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this privacy notice. You must ensure that the individual concerned is aware of the various matters detailed in this privacy notice.
- 3.2 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 statements. When you leave our websites, we recommend and encourage you to read the privacy notice of any other website you visit.

4 DATA WE COLLECT ABOUT YOU

- 4.1 Personal data, or personal information, means any information which is related to an identified or identifiable natural person (i.e. you as an individual). It excludes any data which does not relate to an identified or identifiable individual or personal data rendered anonymous in such a manner that you (as the data subject) are not identified or no longer identifiable (anonymous data).
- 4.2 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, username or similar identifier used by you on any of our platforms or portals, title, date of birth and gender.

Contact Data includes postal address (including home, delivery and billing addresses), email address and telephone numbers.

Financial Data includes bank account, payment card details and other data necessary for fraud prevention and other related billing information.

Transaction Data includes details about payments to and from you and other details of products and /or services you have purchased from us.

Instruction Data includes business information necessarily processed in a project or customer contractual relationship with us or voluntarily provided by you, such as instructions given, payments made and requests.

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 our websites.

Profile Data includes your username and password for any of our websites and portals, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our websites, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Third Party Data includes information that you provide to us during the course of any business dealings that relates to third parties that you are connected to (as per the statement above, this information may also be Personal Data relating to those third parties).

4.3 **"Special Category Data"** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health, data concerning sex life or sexual orientation. We may collect Special Category Data about you including (but not limited to) your NHS Number, details regarding your medical prescriptions, including the type of drugs and devices, batch numbers, and expiry dates. We do not collect any information about criminal convictions and offences.

4.4 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. 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 data which will be used in accordance with this privacy notice.

5 IF YOU FAIL TO PROVIDE PERSONAL DATA

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. 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.

6 HOW IS YOUR PERSONAL DATA COLLECTED?

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

- 6.1.1 **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you or your organisation seek our products or services, create an account or use any service on our websites, subscribe to our services or publications, make an enquiry or otherwise interact on our websites (including by using any chat function on any of our websites), offer to provide or actually provide services to us, request marketing to be sent to you, enter a competition, promotion or survey or give us feedback.
- 6.1.2 **Automated technologies or interactions.** As you interact with our websites, we may 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. We may also receive Technical Data about you if you visit other websites employing our cookies or if you receive emails from us via our third-party provider's marketing tool.
- 6.1.3 **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including analytics providers such as Google based outside the UK; advertising networks; search information providers, data brokers or aggregators who may be based inside and/or outside the UK.

7 HOW WE USE YOUR PERSONAL DATA

7.1 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:

- 7.1.1 Where we need to perform the contract we are about to enter into or have entered into with you. This includes:
- Processing and delivering products and services to you including managing payments, fees and charges and collecting and recovering money owed to us.
 - Managing our relationship with you including notifying you about changes to our terms or privacy notice and asking you to provide a reference or take a survey.

7.1.2 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. This includes:

- Registering you as a new customer and processing and delivering products and services to you – our legitimate interest is being able to provide services or products to you and/or being able to recover debts owed to us.
- Managing our relationship with you including notifying you about changes to our terms or privacy notice and asking you to provide a reference or take a survey – our legitimate interest is keeping our records updated and studying how customers use our products/services.
- Administering and protecting our business and our websites – our legitimate interest is running our business, providing administration and IT services, network security, preventing fraud and in the context of a business reorganisation or group restructuring exercise.
- Delivering relevant website content and marketing to you and measuring or understanding the effectiveness of the marketing we serve to you – our legitimate interest is studying how customers use our products/services, developing them, growing our business and informing our marketing strategy.
- Using data analytics to improve our websites, products/services, marketing, customer relationships and experiences – our legitimate interest is defining types of customers for our products and services, keeping our websites updated and relevant, developing our business and informing our marketing strategy.
- Making suggestions and recommendations to you about goods or services that may be of interest to you – our legitimate interest is developing our products/services and growing our business.

7.1.3 Where we need to comply with a legal or regulatory obligation or where the processing is necessary for the establishment, exercise or defence of legal claims. This includes:

- Registering you as a new customer and processing and delivering products and services.

- Managing our relationship with you including notifying you about changes to our terms or privacy notice and asking you to provide a reference or take a survey.
- Administering and protecting our business and our websites.
- Complying with legal or regulatory obligations (such as record keeping), compliance screening or recording (such as anti-money laundering and fraud and crime prevention) and court orders.

7.1.4 Where we need to carry out a task in the public interest (for example the prevention of fraud). This includes:

- Registering you as a new customer and processing and delivering products and services to you.
- Complying with legal or regulatory obligations (such as record keeping), compliance screening or recording (such as anti-money laundering and fraud and crime prevention) and court orders.

7.1.5 Where you have provided your consent, including:

- Where you request or subscribe to any of our publications or newsletters.
- Where you make an enquiry or otherwise interact on our websites (including by any chat function on any of our websites).
- Where you attend a seminar or other event or complete a survey.
- Where you request marketing to be sent to you.

8 MARKETING

8.1 You may receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with details when you registered to take part in an event that we are organising either alone or in conjunction with others and, in each case, you have not opted out of receiving that marketing.

8.2 We will get your express opt-in consent before we share your personal data with any company outside our group for marketing purposes.

8.3 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 or by contacting us at any time.

8.4 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or other transactions. Opting out will not apply to any personal data that we are required to keep for regulatory, compliance or legal reasons.

9 CHANGE OF PURPOSE

9.1 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.

9.2 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.

9.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10 COOKIES

10.1 Our website and app use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and app and also allows us to make improvements to our services.

10.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device if you agree. Cookies contain information that is transferred to your device's hard drive.

10.3 We use only strictly necessary cookies. These are cookies that are required for the operation of our website. These essential cookies are always enabled because our website and app will not work properly without them. They include, for example, cookies that enable you to log into secure areas of our website. You can switch off these cookies in your browser settings, but you may then not be able to access all or parts of our website or app.

10.4 You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name		Purpose
Cookies used on our website		
1	kmw_u1main	This cookie is used to communicate session information to JavaScript running in the web browser and is necessary to support logging in and out of Bubble apps and saving data to the current user.
2	kmw_live_u2main	This cookie is used as the primary session identifier. This is necessary to support logging in and out of Bubble apps and saving data to the current user.
3	kmw_live_u2main.sig	This cookie is used as the primary session identifier. This is necessary to support logging in and out of Bubble apps and saving data to the current user.
Cookies used on the Device Link application		
4	keepmewell2_u1main	This cookie is used to communicate session information to JavaScript running in the web browser and is necessary to support logging in and out of Bubble apps and saving data to the current user.
5	keepmewell2_live_u2main	This cookie is used as the primary session identifier. This is necessary to support logging in and out of Bubble apps and saving data to the current user.
6	keepmewell2_live_u2main.sig	This cookie is used as the primary session identifier. This is necessary to support logging in and out of Bubble apps and saving data to the current user.

11 DISCLOSURES OF YOUR PERSONAL DATA

11.1 We may have to share your personal data with third parties for the purposes set out in paragraph 4 above. The third parties we may share personal data with are:

11.1.1 Other companies in our group who are based in the United Kingdom and undertake or provide complementary or similar legal and commercial support products and services.

11.1.2 Service providers acting as processors who provide IT and system administration services.

11.1.3 Organisations who provide services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and organisations providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared.

- 11.1.4 Professional advisers including bankers, auditors and insurers based in the UK or outside the UK who provide consultancy, banking, insurance and accounting services.
 - 11.1.5 HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
 - 11.1.6 Courts, law enforcement authorities, regulators or attorneys or other parties based inside and outside the UK as appropriate for the purpose (where it is reasonably necessary) of the establishment, exercise or defence of a legal or equitable claim, or for the purposes of dispute resolution.
 - 11.1.7 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- 11.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

12 INTERNATIONAL TRANSFERS

- 12.1 Some of our third-party service providers (including any sub-processors appointed by them) are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.
- 12.2 Whenever we (and/or our third-party service providers) transfer your personal data out of the UK, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
- 12.2.1 Your personal data is only transferred to countries that have been deemed to provide an adequate level of protection for personal data.
 - 12.2.2 Where we (and/or our third-party service providers) use certain service providers, specific contracts approved for use in the UK which give personal data the same protection it has in the UK are used, or any alternative transfer mechanisms as recognised by applicable data protection law are implemented.

- 12.3 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

13 DATA SECURITY

- 13.1 We have put in place appropriate 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.
- 13.2 We have 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.

14 DATA RETENTION

- 14.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 14.1.1 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 requirements.
- 14.1.2 In some circumstances we may anonymise your personal data (so that it can no longer be associated with or identify you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

15 YOUR LEGAL RIGHTS

- 15.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are to:
- 15.1.1 Request access to your personal data (commonly known as a “**data subject access request**”).

- 15.1.2 Request correction of your personal data.
 - 15.1.3 Request erasure of your personal data.
 - 15.1.4 Object to processing of your personal data.
 - 15.1.5 Request restriction of processing your personal data.
 - 15.1.6 Request transfer of your personal data to you or to a third party in a structured, commonly used, machine-readable format.
 - 15.1.7 Withdraw consent at any time where we are relying on consent to process your personal data.
- 15.2 If you wish to exercise any of the rights set out above, please contact us using the details set out above in clause 1.3.