# **Privacy Policy.**

# Introduction

This notice applies across all websites that we own and operate, and all services we provide, and any other services we may offer (for example, events or training). For the purpose of this notice, we'll refer to them as our 'services'.

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number, details of payments, support queries, community comments and so on. We never keep bank account details, payment card details.

If you can't be identified (for example, when personal data has been aggregated and anonymised) then this notice doesn't apply. Our Terms of Service for more information on how we treat your other data.

We may need to update this notice from time to time. Where a change is significant, we'll let you know - usually by sending you an email.

### Who we are

Anatomical Concepts (UK) Ltd are a Limited Company business based in Scotland and mostly serving clients within the UK and Ireland regions. We represent some international product brands in this region and we provide related sales, support and training services. For European Union data protection purposes, when we act as a controller in relation to your personal data,

#### How we collect your data

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

**Information you provide to us directly:** When you visit or use some parts of our websites and/ or services we might ask you to provide personal data to us. For example, we ask for your basic contact information when you sign up for a newsletter, demonstration, email offer, join us on social media, take part in training and events, contact us with questions or request support.

If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services or that we can't provide what you have asked for.

Prior to providing a quote we may ask for full details of your address and contact information. This helps to verify that you are resident in an area we serve and so that the quote we provide is accurate.

If a product demonstration is required we may ask you to complete a secure on-line form that will both provide information and request it from you.

The information requested may, for some products, include details that will enable us to know that the product will be safe and effective in its intended usage.

When you purchase a product or service from us we will generally store information on a CRM database. This information will include full name and address, email address and contact

numbers. We may store emails exchanged with you for the purposes of servicing a contract. If the product is a medical device we may additionally save information that shows how we verified the product is safe for you to use and details of any assessment carried out on our behalf. If such an assessment was carried out by a third party on our behalf they will have access to that data only for the purposes of ensuring safe and effective implementation of the product or service.

**Information we collect automatically:** We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best experience possible (e.g., by personalising the content you see).

Some of this information is collected using cookies and similar tracking technologies. If you want to find out more about the types of cookies we use, why, and how you can control them, take a look at our cookie notice (see below)

# Information we get from third parties:

We do not obtain information about you from third parties

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our products or services, and some functions and features on our websites may not be available to you.

## Cookies

Cookies are very small text files that are stored on your computer when you visit websites. We use cookies to help identify your computer so we can tailor your user experience, track shopping basket contents and remember where you are in the order process. You can disable any cookies already stored on your computer, but these may stop our website from functioning properly.

The following is strictly necessary in the operation of our website.

The Website Will:

- Remember what is in your shopping basket and
- Remember where you are in the order process

The following are not Strictly Necessary but are required to provide you with the best user experience and also to tell us which pages you find most interesting (anonymously).

<u>Functional Cookies</u> The Website Will: Track the pages you visit via Google Analytics

**Targeting Cookies** 

The Website Will:

Allow you to share pages with social networks such as Facebook or Twitter This website will not share any personal information with third parties.

## How we use your data

First and foremost, we use your personal data to provide you with any products or services you've requested, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

# To communicate with you.

This may include:

- providing you with information you've requested from us (like training or education materials), formal quotations or information we are required to send to you
- operational communications, like changes to our websites and services, security updates, or assistance with using our products and services
- marketing communications (about a product or service we think you might be interested in) in accordance with your marketing preferences
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

**To support you:** This may include resolving technical support issues or other issues relating to the products or services, whether by email, or otherwise.

**To enhance our products and services and develop new ones:** For example, by understanding your use of products and services so we can keep improving, or by carrying out technical analysis we can optimise your user experience and provide you with more efficient tools.

**To protect:** So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites, products and services in accordance with our Terms of Business

**To market to you:** In addition to sending you marketing communications, we may in future also use your personal data to display targeted advertising to you online – through our own websites and services or through third party websites and their platforms.

To analyse, aggregate and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.

## How we can share your data

We may need to share your personal data with third parties. We will only disclose your personal data to:

- our third party, trusted therapy partners where necessary to carry out services on our behalf and to your benefit
- regulators, law enforcement bodies, government agencies, courts or other third parties where necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure
- an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business
- other people where we have your consent.

## **International Data Transfers**

When we gather data, it may be transferred to, and processed in, countries other than the country you live in – such as to the United States. For individuals in the European Economic Area (**EEA**), this means that your data may be transferred outside of the EEA. We generally use SAAS (software as a service) approaches for a number of business processes. Whenever possible we look to use services who host their data within the UK. We do not however disclose personal data to a third party in another country

## Security

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens.

### **Retention of Data**

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

### Your Rights

The personal data we hold is yours and you have certain rights. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or send your request to info@anatomicalconcpets.com

You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it
- object to our continued processing of your personal data

You can exercise these rights at any time by sending an email to <u>datacontroller@anatomicalconcepts.com</u>

If you're not happy with how we are processing your personal data, please let us know by sending an email to <u>datacontroller@anatomicalconcepts.com</u>

We will review and investigate your complaint, and get back to you within a reasonable time frame. You can also complain to your local data protection authority. They will be able to advise you how to submit a complaint.

#### How to contact us

If you are concerned about what personal data we hold about you or you have a question or feedback for us please get in touch.

We prefer to communicate with you by email – this ensures that you're put in contact with the right person. Our general email is info@anatomicalconcepts.com