

Privacy Statement

Precision Health (UK) LTD ("We" or "PH") are committed to protecting and respecting your privacy.

This privacy statement explains what information we gather about you, what and how we use that information, the lawful basis on which that information is used and who we give that information to. It also sets out your rights and our obligations in relation to your information and who you can contact for more information or queries.

Who this privacy statement applies to and what it covers

This privacy statement sets out how we will collect, handle, store and protect information about you when providing services to you or our clients, or performing any other activities that form part of the operation of our business PH. This privacy statement also contains information about when we share your personal information with other members of our group and other third parties (for example, third parties carrying out due diligence activities on our behalf).

In this privacy statement, your information is sometimes called "personal data" or "personal information". We may also sometimes collectively refer to handling, collecting, protecting and storing your personal information as "processing" such personal information.

Children

We understand the importance of protecting children's privacy. Our services are not designed for, or intentionally targeted at, children. It is not our policy to intentionally collect or store information about children.

What information we collect

We may collect and process personal data about you because you give it to us or because it is publicly available.

The personal data that we collect or obtain may include: your name; business name; address (home and business); e-mail address; country of residence; credentials and education details (for example, where you trained as a health professional); your IP address; your browser type and language; your access times; complaint details; details of how you use our products and services; details of how you like to interact with us and other similar information.

We may collect and process personal data about you that you give to us, as follows:

- If you provide information to us by filling in forms on our website. This may include information provided at the time of registering, subscribing to any of our services, posting material, sending messages, giving reviews, making payments through your PH Account or requesting further services.
- Details of any transactions you carry out via our website.
- We may ask you for information when you report an issue or concern.
- We may keep a record of correspondence between you and us.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- We may collect names, address and phone numbers of any client you wish us to send products to (drop-ship) on your behalf. You warrant that this information is correct and legal to share with us in order to process these drop-ships.

Use of personal data

We will use your personal data to fulfil your requests and we will ask only for data that is adequate, relevant and not excessive for those purposes. Where we send you information for any purpose, it may be sent by e-mail or post.

When we ask you for personal data it may include the following purposes:

- We may use it to process any order received by you or your company;
- We may use it to ship any order with our courier service;
- We may use it to be able to send our newsletter to you via MailChimp;
- We may contact you occasionally to inform you of new products and services we will be providing;
- We may send you regular updates on issues we think will be of interest to you;
- We may send you requested information on our products and services;
- We may use your personal data for marketing purposes and market research;
- We may use your personal data internally to provide you with the services offered by us via this website, to administer this website and to help us improve our services.
- We may use your personal data to allow you to participate in interactive features of our service when you choose to do so;
- We may use your personal data to notify you about changes to our services, terms and conditions, policies or website.
- We may use your personal data to manage risk, or to investigate, detect, prevent, and/or remediate fraud, suspected fraud or other potentially illegal or prohibited activities.
- We may use your personal data pursuant to applicable legal or regulatory requirements or to respond to requests and communications from competent authorities (including courts and tribunals).
- We may use your personal data for the services we receive from our professional advisors, such as lawyers, accountants and consultants.
- We may use your personal data for protecting our rights or those of our clients.

None of the information that we request from you is mandatory. However, where such information is not provided to us, PH may be unable to process your order request.

The legal grounds we use for processing personal information

We are not allowed to process personal information if we do not have a valid legal ground. Therefore, we will only process your personal information for the purposes outlined above because:

- of our legitimate interests in the performance of activities that form part of the operation of our business;
- of our legitimate interests in the effective and lawful operation of our business so long as such interests are not outweighed by your interests or fundamental rights and freedoms;
- of the legal and regulatory obligations that we are subject to, such as keeping records for tax purposes or providing information to a public body or law enforcement agency; or

- the information is required in order to carry out the activities that form part of the operation of our business(e.g. the processing is necessary to perform our obligations towards you).

Examples of the 'legitimate interests' referred to above are:

- to benefit from cost-effective services (e.g. we may opt to use certain IT platforms offered by suppliers);
- to verify the accuracy of information provided by a third party;
- to prevent fraud or criminal activity;
- to safeguard the security of our IT systems, architecture and networks, and of our physical premises; and
- to exercise our rights under Articles 16 and 17 of the Charter of Fundamental Rights, including our freedom to conduct a business and right to property.

To the extent that we process any sensitive personal data relating to you for any of the purposes outlined above, we will do so because either: (i) we are required by law to process that data in order to ensure we meet our 'know your client' and 'anti money laundering' obligations (or other legal obligations imposed on us); or (ii) the processing is necessary for the establishment, exercise or defence of legal claims.

Unsubscribe

We may, from time to time, e-mail or post you information to make you aware of our other similar products and services which may be of interest to you. If you do not wish to receive emails or post from us for these purposes or if you want to be removed from our electronic mailing list you can either select "unsubscribe" from any of the marketing emails that we send or alternatively contact us.

Anonymous data collected through this website

In addition to the information we collect as described above, we use technology to collect anonymous information about the use of our website. For example, our web server automatically logs which pages of our website our visitors view, their IP addresses and which web browsers our visitors use. This technology does not identify you personally, it simply enables us to compile statistics about our visitors and their use of our website.

Our website contains hyperlinks to other pages on our website. We may use technology to track how often these links are used and which pages on our website our visitors choose to view. Again this technology does not identify you personally - it simply enables us to compile statistics about the use of these hyperlinks.

Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal data about yourself.

Cookies

In order to collect the anonymous data described in the preceding paragraph, we may use temporary "cookies" that remain in the cookies file of your browser until the browser is closed. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie.

This enables you to decide if you want to accept it or not. We also use your IP address to help diagnose problems with our server and to administer our website. An IP address is a numeric code that identifies your computer on a network, or in this case, the internet. Your IP address is also used to gather broad demographic information. We may also perform IP lookups to determine which domain you are coming from (i.e.: aol.com, yourcompany.com) to more accurately gauge our users' demographics.

Disclosure of your personal data

In connection with one or more of the purposes outlined in the "Use of personal data" section above, we may disclose details about you to: our affiliates; third parties that provide services to us and/or our affiliates, such as our lawyers; competent authorities (including courts and supervisory or other authorities); and other third parties that reasonably require access to personal data relating to you for one or more of the purposes outlined in the "Use of personal data" section above.

Where appropriate, before disclosing personal data to a third party, we contractually require the third party to take adequate precautions to protect that data and to comply with applicable law.

Please note that some of the recipients of your personal data referenced above may be based in countries outside of the European Union whose laws may not provide the same level of data protection. Those countries currently include United States of America. In such cases, we will ensure that there are adequate safeguards in place to protect your personal data that comply with our legal obligations. To ensure this level of protection for your personal information, we typically use a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission.

Protection of your personal data

All PH personnel accessing personal information must comply with the internal rules and processes in relation to the processing of personal data to protect them and ensure the confidentiality of such information.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

How long we keep your information for

We will hold your personal data on our systems for: (i) as long as is necessary for the relevant activity; (ii) any retention period that is required by law or regulation; or (iii) the end of the period in which litigation or investigations might arise in respect of our activities.

Your rights

You have various rights in relation to your personal data. In particular, you have a right to:

- o request a copy of personal data we hold about you
- o ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete
- o ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data
- o object to our processing of your personal data
- o ask that we restrict our processing of your personal data; and

o ask for the portability of personal data - receive the Personal Data you have provided to us in a structured, commonly used and machine-readable form and transmit it to another data controller.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact us at info@precisionhealth.co.uk

Right to complain

If you are unhappy with the way we handled your personal information or any privacy query or request you have raised with us you also have a right to complain to a data protection authority in the place where you live or work, or in the place where you think an issue in relation to your data has arisen.

Changes to our privacy statement

We may modify or amend this privacy statement from time to time. To let you know when we make changes to this privacy statement, we will amend the revision date at the end of this page. The new modified or amended privacy statement will apply from that revision date. Therefore, we encourage you to periodically review this statement to be informed about how we are protecting your information.

Contact

If you have any questions, comments or requests regarding this privacy statement contact us. Last updated: 23 May, 2018