

Privacy Policy

Date of Issue: 10th May 2018

Privacy and cookies policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and app users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and app users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We may use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to *Clin-e-cal Ltd*.

2. How we use your personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - (c) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
- 2.2 We may process data about your use of our website and apps ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is iTunes connect and Google Play Console. This usage data may be processed for the purposes of analysing the use of the website and apps. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and apps.
- 2.3 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of effectively responding to your enquiry. The legal basis for this processing is consent.
- 2.4 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you. The legal basis for this is consent.
- 2.5 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Retaining and deleting personal data

- 3.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 3.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 3.3 We will retain your personal data as follows:
 - (a) *Correspondence data* be retained for a maximum period of 3 years following *date of the last communication*.
 - (b) Data on former employees is generally kept for seven years after ceasing employment.
- 3.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. Security of personal data

- 4.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 4.2 We will store all your personal data on secure servers, personal computers and mobile devices.
- 4.3 Data relating to your enquiries that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.
- 4.4 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

5. Amendments

- 5.1 We may update this policy from time to time by publishing a new version on our website.
- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6. Your rights

- 6.1 In this Section 9, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 6.2 Your principal rights under data protection law are:
 - (a) the right to access;

- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

6.3 You have the right to request a copy of the information that we hold about you and we want to make it as easy as we can for you access this. You can make a 'subject access request' to find out what personal information we hold about you. We would give you a description of the data held; tell you why we are holding it; tell you who it could be disclosed to and let you have a copy of the information in an intelligible form. We will respond within one month as required by data protection legislation.

If you want to make a 'subject access request' please write to us at the address below or by emailing info@clin-e-cal.com.

You are also able to ask us to correct any mistakes in the information we hold or ask for the data to be deleted (assuming we have no other obligation to keep it; we would encourage you to let us use it for suppression purposes only).

If you have a complaint in respect of our handling of your data please contact us using the contact details below.

If you are not satisfied with the way your complaint was handled, you can refer your complaint to UK Information Commissioner's Office.

7. Third party websites

- 7.1 Our website includes may include hyperlinks to, and details of, third party websites.
- 7.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

8. Personal data of children

- 8.1 We do not routinely ask for age related information from people sharing data with Clin-e-cal for the purposes described in this policy. If we have reason to believe that we hold personal data of a person under the age of 18 in our databases, we will delete that personal data.

9. Updating information

- 9.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

10. About cookies

- 10.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 10.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 10.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

11. Cookies that we use

- 11.1 We may use cookies for the following purposes:
 - (a) analysis - we use cookies to help us to analyse the use and performance of our website and apps.

13. Managing cookies

- 13.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
 - (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
 - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
 - (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
 - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
 - (e) <https://support.apple.com/kb/PH21411> (Safari); and
 - (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

- 13.2 Blocking all cookies will have a negative impact upon the usability of many websites.

15. Our details

- 15.1 This website is owned and operated by *Clin-e-cal Ltd.*
- 15.2 We are registered in England and Wales under registration number *09346983*, and our registered office is at *Room 7 Harefield House, Alderley Road, Wilmslow, Cheshire, SK9 1RA.*
- 15.3 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) email, to info@clin-e-cal.com.