



PRIVACY POLICY

DEFINITIONS AND INTERPRETATION

“PneumaCare” means PneumaCare Limited - Registered in England – Registered Number 06515570 with a trading address at Prospect House, 3 St Thomas’ Place, Cambridgeshire Business Park, Ely, Cambridgeshire, CB7 4EX.

“We/Us/Our” means PneumaCare.

BACKGROUND

PneumaCare understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of Our clients and of everyone who visits this website, www.pneumacare.com (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site and when you enter into an agreement with Us for the provision of services.

1. What Does This Notice Cover?

This Privacy Policy explains how We use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

2. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

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Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that We use is set out in Part 4, below.

3. What Are Your Rights?

Under the GDPR, you have the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 9.
- b) The right to access the personal data We hold about you. Part 8 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 9 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We have. Please contact Us using the details in Part 9 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 9.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

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4. What Personal Data Do We Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with Us):

- Name;
- Address;
- Email address;
- Telephone number;
- Business name and address;
- Job title;
- Profession; and
- Information about your preferences and interests.

5. How Do We Use Your Personal Data?

Under the GDPR, We must always have a lawful basis for using personal data. This may be because the data is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data, or because it is in Our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Supplying Our services to you. Your personal details are required in order for Us to enter into a contract with you and for Us to provide Our services to you.
- Personalising and tailoring Our services for you.
- Communicating with you, including responding to emails or calls from you.
- Supplying you with information in respect of our products and services and new developments by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing sales@pneumacare.com).

With your permission and/or where permitted by law, We may also use your personal data for marketing purposes, which may include contacting you by email, telephone and/or post with information, news, and offers on Our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

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 We need to use your personal data for a purpose unrelated to the

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purpose for which we collected the data, We will notify you and We will explain the legal ground for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

Data Security

We have 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 such data. Such third parties will only process your personal data on Our instructions and they are subject to a duty of confidentiality.

We have 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.

6. How Long Will We Keep Your Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected and/or for the purposes of satisfying any legal, accounting, or reporting requirements.

In determining 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.

In some circumstances you can ask Us to delete your data as detailed in Part 3 above.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information independently without further notice to you.

7. How and Where Do We Store or Transfer Your Personal Data?

All your personal data held directly by Us is stored in the UK and will be protected under the GDPR.

We may have to share your personal data with other third parties, including service providers and Our distributors. Where We require your consent to transfer your data in these circumstances, We will notify you accordingly.

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Where a distributor is based within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein, any of your personal data that is transferred will be protected under the GDPR or to equivalent standards by law.

Where a distributor is based outside the EEA then We may transfer your data to a “third country”. In such cases, we take every reasonable measure and precaution to protect and secure your data to a similar degree by ensuring that:

- (a) any such country has been deemed to provide an adequate level of protection for personal data by the European Commission; or
- (b) We use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- (c) Where We use providers based in the United States, We may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide data protection to standards at similar levels to those in Europe.

If none of the above safeguards is available, We may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

We require all third parties to whom We transfer your data to respect the security of your personal data and treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and, where relevant, in accordance with our instructions.

If any of your personal data is required by a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party’s obligations under the law.

In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

8. How Can You Access Your Personal Data?

If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

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All subject access requests should be made in writing and sent to the email or postal address shown in Part 9.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

9. How Do You Contact Us?

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of: The Company Secretary

Email address: sales@pneumacare.com

Postal Address: Prospect House, 3 St Thomas' Place, Cambridgeshire Business Park, Ely, Cambridgeshire, CB7 4EX.

10. Changes to This Privacy Notice

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

We will directly notify our clients of any changes to this Privacy Policy.

Please check this Privacy Policy from time to time to ensure you are aware of any updates we may have made to our personal data handling practices. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site, or on receipt by any other means, following the alterations.

Last Updated: May 2018

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