

Red Medtech Ltd.	PRIVACY POLICY	Version No.
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PRIVACY POLICY

Red Medtech value your privacy and we care about how we look after your personal data. We are a Data Controller and as such are responsible for any personal information that we collect or you provide to us during the course of our contact with one another.

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights please contact us via our dedicated email account dataprotection@redmedtech.co.uk

Our full contact details are: Red Medtech Limited (hereafter "Red Medtech"), we are registered in England and Wales under registration number 13474362 and our registered office address is C/O Bevan Buckland Llp Ground Floor Cardigan House, Castle Court Swansea Enterprise Park, Swansea, Wales, SA7 9LA. You can contact us via our website <https://redmedtech.co.uk> or email at dataprotection@redmedtech.co.uk or by telephone on 01267 243388 during the hours of 9:00am – 5:00pm Monday to Friday (except on bank holidays). We are registered with the Information Commissioner's Office (ICO) under reference C1402134. You have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues (<https://ico.org.uk>) please read: <https://ico.org.uk/for-the-public/raising-concerns/> for details of how to do this.

We would appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance at dataprotection@redmedtech.co.uk

This policy describes:

- what personal information we collect about you
- how we obtain your personal information
- how we use your personal information
- on what basis we use your personal information
- how long we keep your personal information
- who we share your personal information with
- how we protect your personal information
- your rights regarding your personal information

What personal information do we collect about you?

We may collect personal information from you in the course of our business, including through your use of our website, when you contact or request information from us, when you engage our consulting services or as a result of your relationship with one or more of our staff and clients.

The personal information that we process includes:

- Basic information, such as your name (including name prefix or title), the company you work for, your title or position and your relationship to a person
- Contact information, such as your postal address, email address and phone number(s)
- Financial information, such as payment-related information
- Information you provide to us for the purposes of attending meetings and events
- Technical information, such as information from your visits to our website or in relation to materials and communications we send to you electronically
- Identification and background information provided by you, or collected as part of our business acceptance and identification process
- Personal information provided to us by or on behalf of our clients or generated by us in the course of providing services to them, which may include special categories of data
- Any other information relating to you which you may provide to us

How we obtain your personal information

- We collect information from you as part of our business acceptance processes and about you and others as necessary in the course of providing consulting services
- We collect your personal information while monitoring our technical information tools, including our website and email communications sent to and from Red Medtech
- We gather information about you when you provide it to us, or interact with us directly, for instance engaging with our staff, accessing our recruitment process, or registering your details on one of our digital forms

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Use of the Red Medtech website & our use of cookies

A number of facilities on our website, including but not limited to forms and portal areas, may invite you to provide us with personal information. The purpose of these facilities is apparent at the point that you provide your personal information and we only use that information for those purposes.

Our website uses Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the website is used to help us to improve it. Google Analytics does this by placing small text files called 'cookies' on your device. The information that the cookies collect, such as the number of visitors to the site, the pages visited and the length of time spent on the site, is aggregated and therefore anonymous.

We also use personal information to understand whether you read some of the emails and other materials that we send to you, click on the links to the information that we include in them, and whether and how you visit our website after you click on that link (immediately and on future visits). We do this by using software that places a cookie on your device which tracks this activity and records it against your email address. If you receive marketing communications from us and no longer wish to do so, you may unsubscribe at any time by emailing hello@redmedtech.co.uk

You may refuse the use of cookies or withdraw your consent at any time by selecting the appropriate settings on your browser but please note that this may affect your use and experience of our website. By continuing to use our website without changing your privacy settings, you are agreeing to our use of cookies.

How we use your personal information

Red Medtech collects and processes personal information about you in a number of ways in the provision of services by us. We use that information to:

- Provide and improve our services to you and to our clients, including handling the personal information of others on behalf of our clients
- Provide information requested by you
- Promote our services, including sending regulatory, technical and service updates, publications and details of events
- Manage and administer our relationship with you and our clients
- Exercise due diligence for the purposes of recruitment
- Fulfil our legal, regulatory & risk management obligations, including establishing, exercising or defending legal claims

Meetings, events and seminars

We will collect and process personal information about you solely or jointly in relation to your attendance at our offices or at a meeting, event or seminar organised by Red Medtech or our business partners. We will only process and use special categories of personal information to meet any other legal or regulatory obligations we may have. We may share certain information with IT and other service providers or business partners involved in organising or hosting the relevant event e.g. contact information and other relevant information such as access and/or dietary requirements.

Consulting and other services

We collect, create, hold and use personal information in the course of and in connection with the services we provide to our clients. We will process identification and background information as part of our business acceptance, finance, administration and marketing processes, including but not limited to anti-money laundering, conflict, reputational and financial checks. We will also process personal information provided to us by or on behalf of our clients for the purposes of the work we do for them. The information may be disclosed to third parties to the extent reasonably necessary in connection with that work. Please also see 'Who we share your personal information with' for more detail.

On what basis we use your personal information

We use your personal information on the following basis:

- To perform a contract, such as engaging with an individual to provide consulting or other services
- To comply with legal and regulatory obligations
- For legitimate business purposes. Please see 'How we use your personal information' for more detail

How long we keep your personal information

Your personal information will be retained in accordance with our data retention policy. This is based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and Red Medtech business purposes.

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Who we share your personal information with

We may also share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including:

- Our professional advisers, solicitors, accountants and bankers;
- Third parties engaged in the course of the consulting services we provide to clients and with their prior consent, such as specialist service providers, and sub-contracted consultants.
- Third parties involved in hosting or organising meetings, events or seminars, and IT service providers to Red Medtech

Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of the business, we may need to transfer your information to new Red Medtech entities or to third parties through which the business of Red Medtech will be carried out. In that instance, the privacy policy provided by the new regulated entity will be applicable.

Red Medtech uses social media sites such as LinkedIn, Instagram and Facebook. If you use these services, you should review their privacy policy for more information on how they deal with your personal information.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior consent.

How we protect your personal information

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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have measures 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.

You acknowledge that the Internet and email is not a completely secure medium for communication and accordingly, we cannot guarantee the security of any information you send to us (or we send to you) via the Internet. We are not responsible for any damages which you, or others, may suffer as a result of the loss of confidentiality of such information and you should take appropriate measures in your use of the internet and IT to protect your data security.

Your rights regarding your personal information

The European Union's General Data Protection Regulation and other applicable data protection laws provide certain rights for data subjects in particular circumstances including but not limited to:

- Request access to your personal data
- Request correction of the personal data we hold about you
- Request deletion or removal of your personal data
- Object to or request restriction of processing of your personal data

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see 'How we use your personal information') or that you may not be able to make use of the services offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by email at dataprotection@redmedtech.co.uk

The rights detailed above do not increase your Statutory Rights and are intended to merely reflect your existing statutory rights. Our Policy must be read in conjunction with the General Data Protection Regulation (EU) 2016/679 and all other relevant legislation.

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