

ELAROS 24/7 Limited PRIVACY POLICY

INTRODUCTION

Welcome to ELAROS 24/7 Limited's (ELAROS) privacy policy. This privacy policy will tell you: -

- - how we look after personal data when you deal with us or visit our website at <https://elaros.com> (**Our Website**) or if you use an app, website or cloud-based software that we provide
- - about your privacy rights
- - how the law protects you.

ELAROS respects personal privacy and is committed to protecting personal data and fully complying with its legal obligations under the GDPR and the Data Protection Act 2018.

1. Purpose of This Privacy Policy

This privacy policy aims to give you information about how ELAROS collects and processes personal data when you; deal with us, use **Our Website**, or you use an app, website or cloud-based software that we provide.

2. Who are ELAROS

ELAROS 24/7 Limited (ELAROS) is a company which was incorporated on the 14 December 2010 in England and Wales under No. 07469411 and whose registered office is at Electric Works, Sheffield Digital Campus, Sheffield, S1 2BJ. The business of ELAROS is the development of health technologies, health apps, clinical web portals and clinical assessment tools.

3. Contacting ELAROS

You can contact ELAROS by writing to us at the above address, or by emailing us at hello@elaros.com or by calling us on 0114 286 6200.

4. Who is responsible for the management of data protection at ELAROS?

We have appointed **Philip Walker** as our data protection officer. Mr. Walker is responsible for the management of data protection at ELAROS and for dealing with any questions you may have in relation to this privacy policy. He can be contacted using the contact details given in sections 2. and 3. above.

ELAROS hosts its **Digital Bladder Diary** app and cloud-based software through a third-party hosting provider, **Pipe and Piper** (<https://pipeandpiper.co.uk>). You can contact Pipe and Piper for more information on their privacy, cookie and data policies relating to the collection and storage of personal user data from this particular system by writing to them at info@pipeandpiper.co.uk or by calling them on 0114 2555 855.

5. What sort of personal data do we hold and collect?

Personal data means any information about an individual (a data subject) from which that person can be identified. It does not include data from which the identity of an individual cannot be identified (anonymous data).

Almost all the personal data we process relates to users of our apps, websites or cloud-based software that we provide to patients, clinicians and other staff within the wider healthcare industry.

ELAROS hosts its apps, websites and cloud-based software through third-party hosting providers which may collect personal data relating to the users (**User Personal Data**) of such systems of the following types:

- **Identity Data** including, for example, people's first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** including, for example, people's address, billing, delivery or email address and people's mobile and landline telephone numbers.
- **Technical Data** including, for example, internet protocol (IP) addresses, people's login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technology on the devices people use to access our websites.
- **Profile Data** including, for example, people's username and password, purchases or orders made by people, people's interests, preferences, feedback and survey responses].
- **Usage Data** including, for example, information about how people use **Our Website**.
- **Marketing and Communications Data** including, for example, people's preferences in relation to receiving marketing communications.

Our access to **User Personal Data** is strictly limited as set out in our third-party hosting provider policies relating to the system(s) being hosted by them. For policies relating to the collection, storage and management of data on the following systems, please refer to: -

- GoDaddy's (<https://uk.godaddy.com/legal/agreements/privacy-policy>) policies for information relating to the data they collect to deliver the service of hosting **Our Website**
- cPanel's (<https://cpanel.net/privacy-policy/>) policies for information relating to the processing of data we collect through our website
- Pipe and Piper's (<https://pipeandpiper.co.uk>) policies for information relating to the data they collect through ELAROS' Digital Bladder Diary system on behalf of ELAROS

In relation to **User Personal Data**, cPanel and Pipe and Piper are the data processors for the relevant system(s) they provide for ELAROS and not the data controller. A data processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Processors are separate legal entities to the controller which act on behalf of, and only on the instructions of, the relevant controller and do not have any purpose of their own in processing the data. Processors cannot take any of the overarching decisions, such as what types of personal data to collect and what it will be used for.

In addition, ELAROS holds personal data relating to users who visit **Our Website (User Personal Data)** via cPanel which is hosted on GoDaddy (<https://uk.godaddy.com>). In relation to users who visit **Our Website** we only hold **Technical Data**. In relation to all **User Personal Data** ELAROS is, for the purposes of data protection legislation, the controller. A controller is a "natural or legal person, public authority, agency or other body which, alone or jointly with

others, determines the purposes and means of the processing of personal data". In short, we determine why such personal data is being processed and how.

6. How do we collect personal data

We collect **User Personal Data** through our third-party hosting providers (for example **Our Website** hosted on GoDaddy and managed through cPanel or our Digital Bladder Diary system hosted by Pipe and Piper).

We use different methods to collect **User Personal Data** from and about our clients and potential clients who visit **Our Website** including the following:-

Direct interactions. Users may give us their Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data our clients provide when they become users of ELAROS or give us feedback or contact us.

Automated technologies or interactions. As clients and potential clients interact with **Our Website**, we may automatically collect Technical Data about their equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. Where the Digital Bladder Diary system uses cookies, Pipe and Piper will obtain user consent prior to obtaining any personal data relating to such users by their use: see their **Cookie Policy** (<https://pipeandpiper.co.uk>).

7. How do we use personal data?

We will only process personal data when the law allows us to.

In relation to **User Personal Data**, we will only use your personal information to:

- Provide ELAROS services to you
- Respond to your requests, enquiries, comments or concerns relating to any of the systems we provide
- Enable you to personalise ELAROS services and to select content you want to access or to share with a third party
- Notify you about changes or updates to ELAROS and other products and services we provide ourselves or through third parties
- Provide you with special offers and other information about related events, products and services and to invite you to participate in surveys, promotions and conversations, as determined by your choices and communications preferences
- Evaluate and improve ELAROS and other products and services to develop new products or services
- Identify and analyse usage trends and determine the effectiveness of our promotional campaigns
- Provide technical, product and other support and help keep ELAROS services working, safe and secure; and
- Comply with our legal obligations

We may also combine the personal information that you provide with information that we obtain from other sources or that already exist in our records for the purposes described above. Any use of your personal information for a purpose other than those described in this privacy policy will require your express consent.

8. How do we store your data?

ELAROS securely stores your data through its third-party hosting providers relevant to the systems which users interact with. For more information on cPanel and Pipe and Piper's storage policies for data collected on our website and Digital Bladder Diary systems respectively, visit their websites.

9. Marketing

We won't share **User Personal Data** with any third party for marketing purposes without first obtaining our user's express opt-in consent. Our users can ask us or third parties to stop sending them marketing messages at any time by following the opt-out links on any marketing message sent to them or by contacting us at any time.

We never share **User Personal Data** with any third party for marketing purposes.

10. What are your data protection rights?

ELAROS would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request ELAROS to provide copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that ELAROS corrects any information that you believe is inaccurate. You also have the right to request that ELAROS completes information you believe is incomplete.

The right to erasure – You have the right to request that ELAROS erases your personal data, under certain conditions.

The right to restrict processing – You have the right to request that ELAROS restricts the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to ELAROS processing your personal data, under certain conditions.

The right to data portability – You have the right to request that ELAROS transfers the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us on email: hello@elaros.com

Call us at: 0114 286 6200

Write to us at: Electric Works, Sheffield Digital Campus, Sheffield, S1 2BJ

11. What are cookies?

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit allaboutcookies.org.

12. How do we use cookies?

Where the Digital Bladder Diary system uses cookies, Pipe and Piper will obtain user consent prior to obtaining any personal data relating to such users by their use: see their **Cookie Policy** (<https://pipeandpiper.co.uk>).

13. Privacy policies of other apps, websites or cloud-hosted systems

Our Website may contain links to other websites. Our privacy policy applies only to our website or systems, so if you click on a link to another website, you should read their privacy policy.

14. Changes to our privacy policy

ELAROS keeps its privacy policy under regular review and places any updates on its home web page. This privacy policy was last updated on 26 October 2020.

15. How to contact us

If you have any questions about ELAROS' privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us on email: hello@elaros.com

Call us at: 0114 286 6200

Write to us at: Electric Works, Sheffield Digital Campus, Sheffield, S1 2BJ

16. Contacting the regulator to make a complaint

Data subjects have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority in relation to data protection issues (www.ico.org.uk). If a data subject feels that their data has not been handled correctly, or is unhappy with our response to any requests that they have made to us regarding our use of their personal data, they have the right to lodge a complaint with the Information Commissioner's Office. We would, however, appreciate the chance to deal with any such concerns before you approach the ICO so please contact us in the first instance.

The ICO can be contacted by calling 0303 123 1113 or by going online at www.ico.org.uk/concerns.

If a data subject is based outside the UK, they have the right to lodge a complaint with the relevant data protection regulator in their country of residence.

19. Further information

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to hello@elaros.com.