

**LAST UPDATED: 05 DECEMBER 2019**

## **PD NEUROTECHNOLOGY LTD - PRIVACY POLICY RELATING TO THE USE OF THE COMPANY WEBSITE**

At PD Neurotechnology Ltd, we take your privacy seriously. We are committed to protecting it.

This policy explains when and why we collect personal information about individuals when accessing this website, [www.pdneurotechnology.com](http://www.pdneurotechnology.com) (the “**Website**”), how this information is used, with whom we may share it and your rights in relation to that information.

This policy may change from time to time so please check this page occasionally (or our website at: [www.pdneurotechnology.com/wp-content/uploads/pp.pdf](http://www.pdneurotechnology.com/wp-content/uploads/pp.pdf)) to ensure that you’re happy with any changes.

This policy was last updated on the date that is stated at the top of the policy.

If you would like to understand how we use your personal information when you:

- use our Apps, Physician Website Portal at [www.pdmonitorapp.com](http://www.pdmonitorapp.com) and the PDMonitor® System, please see our separate [Privacy Policy](#) for use and set-up of Apps, Physician Website Portal and PDMonitor® System; and
- use our Physician Training Portal located at [academy.pdneurotechnology.com](http://academy.pdneurotechnology.com), please see our separate [Privacy Policy](#) for use of the Physician Training Website.

### **1. ABOUT PD NEUROTECHNOLOGY LTD**

PD Neurotechnology Ltd is a company that focuses on the research, development and distribution of products and services designed to improve the monitoring, diagnosis and treatment of patients suffering from Parkinson’s disease and other movement disorders.

Our Product is a solution for Parkinson’s Disease (**PD**) symptom management and consists of the following parts:

- a medical device consisting of five monitoring sensors worn by a patient which collect kinematic raw data and a stationary docking station which charges the sensors and collects, stores and processes data from the monitoring devices (“the PDMonitor® System”);
- mobile applications for each user group of the Platform, comprising:
  - an application for patients to upload information about their condition;
  - an application for caregivers to upload information about a patient’s condition on their behalf, monitor patient progress and symptoms and receive alerts and notifications about patients; and
  - an application for physicians to view a summary of the information uploaded by a patient or their caregiver; and
- a website portal for physicians to view a summary of the information uploaded by a patient or their caregiver and view symptom reports located at [www.pdmonitorapp.com](http://www.pdmonitorapp.com) (the “**Website Portal**”),

the Apps and Website Portal collectively, (the “**Platform**”).

The registered address for PD Neurotechnology Ltd is 5th Floor, 2 More London Riverside, London, United Kingdom, SE1 2AP.

We collect your personal information through the Website and are the ‘data controller’, deciding why and how your personal information is processed in relation to your use of this Website.

Where this policy refers to “we”, “our” or “us” below, this is referring to PD Neurotechnology Ltd.

## **2. HOW WE COLLECT AND USE YOUR INFORMATION**

### **2.1. How we collect information from you**

We may collect and process the following data about you:

- **Information you give us.** This is information about you that you give us when you use our Website and by communicating with us by phone, e-mail, social media or otherwise. This includes information provided at the time of purchasing a product from our Website and registering for an account with us, and subsequently managing your account online. This information is given by you entirely voluntarily. However, if you do not provide this information, we will not be able to register an account for you, you will not be able to access the materials on our Website and you may be unable to communicate with us effectively.

We may also ask you for information when you report a problem with our Website. If you complete any surveys that we ask you to participate in, or you give any feedback, we will collect your information in these circumstances as well. The information we collect from surveys will generally be on an anonymous basis, however you may be asked to leave your contact details if you would like us to respond to you.

- **Information we collect about you.** We automatically collect information when you visit the Website, including the different actions you perform when using the Website. We only track your activity when navigating the site to improve its performance, and identify and fix problems regarding its functionality. This information may be collected by cookies placed on our Website – please see [Security, Cookies and Links](#) below for more information.

### **2.2. What type of information do we process about you**

The personal information we process about you might include:

- your name, address, e-mail address, phone number, date of birth;
- details of your transactions;
- any personal information you include when corresponding with us; and
- your browser type, operating system, cookies ID, the different actions you perform including pages you have visited and the IP address from the pages you visit on the Website.

### **2.3. How we use your information and the legal bases on which we rely**

We use your personal information for a number of different purposes and rely on different legal bases that allow us to do so lawfully. The legal bases on which we rely are highlighted in bold below.

We may use and process your personal information where you have **consented** for us to do so for the purpose of sending you direct marketing communications by email, SMS, post and/or phone. Please see Marketing below for further information, including how you can withdraw your consent.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Withdrawing your consent](#) for further details.

Where we have supplied you with any products, we may use your personal information to contact you if there are any urgent safety or product recall notices to communicate to you or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your **vital interests** for us to use your personal information in this way.

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes:

- to verify the information that you provide to us upon account registration and to create and provide you with access to your account;
- to ensure the physical, IT and network security of our systems for our legitimate interest of operating our Website securely;
- to improve the services we offer you on our Website for our legitimate interest of ensuring that we are offering relevant services based on the needs of our customers;
- for the establishment and defence of our legal rights for our legitimate interest of ensuring that our business interests are protected; and
- for the management of queries, complaints, or claims for our legitimate interest of ensuring that we are providing you with the necessary support and to improve our services.

We may use and process your personal information where we have supplied you (or continue to supply you) with any products or services. We will use this information in connection with the **contract** for the supply of products or services when it is needed to carry out that contract or for you to enter into it. Please see [What type of information do we process about you above](#) for details of the types of personal information we process for these purposes.

Where we have supplied you with any products we may use your personal information to contact you if there are any urgent safety or product recall notices. It is in your **vital interests** for us to use your personal information in this way.

We may need to process your information in order to **comply with a legal obligation** that applies to us. This includes where we are required to: (i) assist any public authority or criminal investigation body where we are legally obliged to provide such assistance; (ii) comply with a request from you in connection with the exercise of your rights; (iii) identify you when you contact us; and/or (iv) verify the accuracy of data we hold about you.

Your information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We may use this data for analytical and research purposes, and this may be disclosed to third parties that we are working with.

We may use and process your personal information where we have supplied you (or continue to supply you) with any products or services, where we have arranged for the supply of another company's products or services to you, or where you are in discussions with us about any new product or service. We will use this information in connection with the contract for the supply of products or services when it is needed to

**carry out that contract** with you or, if you have asked us to, **for you to enter into a contract**. Please see What type of personal information do we process about you above for details of the types of personal information we process for these purposes.

## **2.4. Marketing**

We may collect your preferences to receive marketing information from us about our products and services in the following ways:

- when you register for an account and indicate that you would like to receive such marketing from us; and
- when you refresh your marketing preferences when responding to a request from us to do so from time to time.

The way we communicate with you will depend on what method(s) you selected at the time of opting in to our marketing communications. Marketing communications may be by email, SMS, post and/or phone.

You have the right to withdraw your consent (opt out) at any time to our use of your personal information for marketing purposes. Please see [Withdrawing your consent](#) below for further details on how you can do this.

We may make automated decisions about you based on your personal information. We do this so that we can provide you with personalised marketing based on your activity, website browsing history, and other information you provide to us (none of these will have a legal or other significant effect on you).

## **2.5. Third Party Marketing**

We will only share your information with our third party partners for them to contact you with marketing information about their products and services where you have indicated that you would like us to do so. Please use the link on the page requesting your consent to find out more about these third parties. Once shared, the relevant third party's privacy policy will apply to their processing of your personal information, not ours. If you'd like to opt-out of receiving marketing from a third party after providing your consent, you can do so at any time by contacting the relevant third party directly.

You have the right to opt-out of our use of your personal information to provide marketing to you in any of the ways mentioned above. Please see [Withdrawing your consent](#) and [Objecting to our use of your personal information and automated decisions made about you](#) above for further details on how you can do this.

## **2.6. Information about children**

Individuals under the age of 18 are not permitted to use the Website.

We are committed to protecting the privacy of children and do not knowingly ask children to provide personal information to us.

# **3. OTHERS WHO MAY HAVE ACCESS TO YOUR INFORMATION**

## **3.1. Our suppliers and service providers**

We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include technical support agents, network providers, contact centres, hosting services providers, legal and other professional advisers, installers or IT service providers or other third parties who provide services to us. These third parties are all located in the European Economic Area and the USA.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

When you purchase any of our products or services online, your credit/debit card payment is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us using the details at the end of this policy.

### **3.2. Other ways we may share your data**

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers. However, we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

## **4. TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE**

As part of the services offered to you through this Website, the information which you provide to us may be transferred to countries outside the European Economic Area (“**EEA**”). By way of example, this may happen if any of our servers or those of our third party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK. Please see Our suppliers and service providers for details regarding the locations of our third party service providers.

If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Policy. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

If you use our Website while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with our services.

## **5. YOUR RIGHTS**

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month after we have received this information or, where we already have this information, after we have received your request.

### **5.1. Accessing your personal information**

You have the right to ask for a copy of the information that we hold about you by emailing, phoning or writing to us at the address or number at the end of this policy or by creating a support ticket by using the contact form on the company website: [www.pdneurotechnology.com](http://www.pdneurotechnology.com) (a “**Ticket Request**”).

We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

## **5.2. Correcting and updating your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy.

## **5.3. Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, you may withdraw your consent at any time by emailing, phoning or writing to us at the address or number at the end of this policy or by creating a Ticket Request (as described in section 5.1). If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our unsubscribe tool in the relevant communication or by emailing, phoning or writing to us at the address at the end of this policy or by creating a Ticket Request (as described in section 5.1). If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

## **5.4. Objecting to our use of your personal information and automated decisions made about you**

Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as set out in section 2.3 above, you may object to us using your personal information for these purposes by emailing, phoning or writing to us at the address at the end of this policy or by submitting a Ticket Request, (as described in section 5.1). We will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

We do not envisage that any decisions will be taken about you using purely automated means, however we will update this policy if this position changes.

## **5.5. Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing, phoning or writing to us at the address or number at the end of this policy or by creating a Ticket request (as described in section 5.1). Provided we do not have any continuing lawful reason to continue processing or holding your personal information, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. We may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

## **5.6. Transferring your personal information in a structured data file**

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out in section 2.3 above, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns

other individuals or we have another lawful reason to withhold that information.

### 5.7. Complaining to a data protection regulator

You have the right to complain to a data protection regulator in the European Economic Area (which in the UK is the Information Commissioner's Office ("ICO")) if you are concerned about the way we have processed your personal information. Please visit <https://ico.org.uk/concerns/handling/> for further details about the ICO.

## 6. THE PERIOD FOR WHICH WE HOLD YOUR PERSONAL INFORMATION

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that data and our obligations under other laws.

We do not retain personal information in an identifiable format for longer than is necessary.

We do not always apply a fixed retention period to the personal information we hold. Where it is not possible to provide details of a fixed retention period, we have instead provided details of the criteria we use to determine the period that applies.

We will retain your personal information as follows:

Data category/document	Retention period/criteria
Account Data, including our correspondence with you	10 years. You can close your account at any time, at which time you can request that we delete all of the personal information we hold about you, otherwise we will retain your personal information contained in your account for 10 years from the date of your account closure.  Please note that you will not be able to restore your account if you request that your personal information is deleted upon account closure.
Data collected on visits to our Website	6 months to investigate/ensure system stability.

The only exceptions to the periods mentioned above are where:

- as mentioned in the table above, you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [Your rights](#));
- you exercise your right to require us to retain your personal information for a period longer than our stated retention period (see further [Your rights](#));
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

## **7. SECURITY, COOKIES AND LINKS**

### **7.1. Security measures we put in place to protect your personal information**

When we collect and store your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access, including encrypting information and carrying out regular back-ups.

Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### **7.2. Use of 'cookies'**

Like many other websites, our Website uses cookies. 'Cookies' are small pieces of information sent to your device and stored on its hard drive to allow our websites to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our Cookie Policy (at: <https://www.pdneurotechnology.com/wp-content/uploads/cp.pdf>).

### **7.3. Links to other websites**

Our Website may contain links to other websites run by other organisations. This Privacy Policy applies only to our Website only, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide.

In addition, if you linked to our Website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## **8. CHANGES TO OUR PRIVACY POLICY**

Any changes we make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this policy.

## **9. CONTACTING US AND OUR DATA PROTECTION OFFICER**

Please direct any queries about this policy or about the way we process your personal information to our Data Protection Officer using our contact details below.

If you wish to write to us, please write to Data Protection Officer, 5th Floor, 2 More London Riverside, London United Kingdom SE1 2AP.

If you wish to email us, please email [support@pdneurotechnology.com](mailto:support@pdneurotechnology.com).

Our email address for data protection queries is [dpo@pdneurotechnology.com](mailto:dpo@pdneurotechnology.com).

If you would prefer to speak to us by phone, please call +302651001300.