

## **Privacy & cookie policy**

### **Ossian Medical Solutions Ltd**

This policy applies to the personal data that Ossian Medical collects and processes belonging to you or your personnel in the context of providing services to you or your business, including the associated website [www.OssianMedical.com](http://www.OssianMedical.com).

This policy explains how we use any personal information we collect and process about you or your personnel.  
It includes details on:

- Who we are
- What personal data we collect
- How we collect personal data
- Why we process personal data
- Who has access to the personal data
- How we protect personal data
- How long we keep personal data
- Your rights
- Cookies
- Changes to our privacy policy and your duty to inform us of changes
- How to contact us

### **Who we are**

We are Ossian Medical Solutions Ltd, a company incorporated and registered in Scotland with registration number SC420384 whose registered office is at 24 James Street, Helensburgh, Dunbartonshire, G84 8UH

We are the controller and responsible for the personal data collected and processed.

We are committed to being transparent about how we collect and use that personal data and to meeting our data protection obligations.

### **What personal data we collect**

We collect and process a range of personal information about you and your personnel. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you. This includes:

- Identity details (including name, address, title).
- Contact details (including address, telephone number, email address).
- Financial data (including bank account and payment card details).

- Transaction data (including details about payments to and from you and other details of services you have purchased from us).
- Technical data (including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites).
- Usage data (including information about how you use our websites and services).
- Marketing and communications data (including preferences in receiving marketing from us and communication preferences).

### **How we collect personal data**

We collect this information in a variety of ways. For example, data is collected when you:

- Fill in forms, or voluntarily send an enquiry by post, phone, email, via our websites and apps or otherwise
- Apply for our services
- Request marketing to be sent to you
- Give us feedback or contact us
- Contract with us for any of our services
- Complete application forms or provide us with a CV

We also collect information from third party direct marketing database providers.

As you interact with our websites, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see the section on cookies below for further details.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### **Why we process personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data on the basis of the following lawful grounds:

- Where we need to perform the contract we are about to enter into or have entered into with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, to keep our records updated, to study how customers use our services, to develop our services and grow our business, to inform our marketing strategy, for running our business, the provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or restructuring exercise).
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. We need to process personal data for a variety of reasons:

- to allow us to maintain accurate customer records and contact details
- to process and deliver your order including manage payments and collect and recover money owed to us
- to manage our relationship with you which will include notifying you about changes to our terms or privacy policy
- to administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
- to use data analytics to improve our websites, services, marketing, customer relationships and experiences
- for defence against potential legal claims.

### **Change of purpose**

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Who has access to personal data**

Your information will be shared internally, including with members of the HR and recruitment team, managers in the business area applicable to the data and Finance and IT staff if access to the data is necessary for performance of their roles.

We may share the data with third parties in the context of carrying out our due business process such as HR, Finance and IT matters.

We may also share your personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We will not transfer your data to countries outside the UK or European Economic Area. Whenever we transfer your personal data out of the UK to the European Economic Area, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

### **How we protect personal data**

We take the security of your personal data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our officers and employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **How long do we keep personal data**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine 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, regulatory, tax, accounting or other requirements.

## **Your rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You can:

- access and obtain a copy of your data on request;
- request us to change incorrect or incomplete data;
- request us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing;
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data;
- request the transfer of your personal data to you or to a third party; and
- withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent

If you would like to exercise any of these rights, please contact us

<https://ossianmedical.com/contact-us>

## **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is

not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Cookies**

Cookies are small amounts of information which we store on your computer. Unless you have indicated your objection when disclosing your details to us, our systems will issue cookies to your computer when you log on to our websites and apps. Cookies make it easier for you to log on to and use the site during future visits. They also allow us to monitor website traffic and to personalise the content of the site for you.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

<b>Cookie</b>	<b>Description</b>	<b>Duration</b>
Crumb	Squarespace sets this cookie to prevent cross-site request forgery (CSRF).	Session
ss_cvr	SquareSpace sets this cookie to identify unique visitors and track a visitor's sessions on a site.	1 year 1 month 4 days
ss_cvt	SquareSpace sets this cookie to identify unique visitors and track a visitor's sessions on a site.	30 minutes

To ensure you can fully use all the features of our websites and apps, your computer or mobile device will need to accept cookies. Using cookies is the only way we can provide you with certain features of our website and apps.

We use a combination of both session and persistent cookies. Session cookies keep track of your current visit and how you navigate the site, persistent cookies enable our websites and apps to recognise you as a repeat visitor when you return. The session cookies will be deleted from your computer when you close your browser. Persistent cookies will be removed on a predetermined expiry date, 12 months after it has been initiated, or when deleted by you.

**Managing cookies:** If you would prefer to block, limit or delete cookies, you can use your web-browser to do this. Each web-browser has different ways of doing this, so please look at the 'Help' menu of your browser to learn how to change your cookie preferences. Or visit [www.aboutcookies.org](http://www.aboutcookies.org) for more

information on how to change your cookie settings in a wide variety of different web browsers. If you block, limit or delete cookies, you will still be able to navigate our websites and apps, but certain features might not function correctly.

**Other Websites:** Our websites and apps contain links to other websites. This privacy policy and cookies policy only applies to our websites and apps so when you link to other websites you should read their own privacy and cookies policies.

**Google Analytics:** This is used by nearly every website in the world and helps us view and analyse visitor information, such as browser versions, visitor numbers, and response to marketing activity. This information enables us to improve our websites and your visiting experience. The information stored by these cookies is secure and can only be seen only by us, and Google and never stores any confidential information.

**Social Media Share Tools:** If you decide to 'share' any of our content with friends or associates through any of the social networks, you may be sent cookies from these websites. We cannot control the creation of these cookies, so we suggest you visit the third-party websites for more information about their cookies and how to manage them.

### **Changes to our Privacy Policy and your duty to inform us of changes**

We keep our privacy policy under regular review and we will place any updates on this web page.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Contact Us**

Please contact us if you have any questions about our privacy policy or information we hold about you: The person with responsibility for data protection compliance is contactable at <https://ossianmedical.com/contact-us>

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.