



PRIVACY NOTICE

Effective – 29th August 2020

Clini-hub Limited is a medical research company developing patient monitoring systems to a global audience. Clini-hub Limited, (hereinafter referred to as “Seller”, “us” or “we”) are committed to protecting your privacy.

This Privacy Notice applies to the capture of Personal Data on our website located at www.clini-hub.com (the “Website”) together with the collection of data by other means and the steps taken by us to respect your privacy.

Clini-hub Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

We have created this Privacy Notice to demonstrate our commitment to fair information practices and its respect for your right to privacy and the protection of privacy. This Privacy Notice describes how we collect, use, disclose, transfer and store your information. By using the Website, you (the “User” or “you”) consent to the data practices contained in this Privacy Notice. If you do not agree with the data practices described in this Privacy Notice, please immediately cease using the Website.

The Privacy Notice explains the following

- How we collect and use your personal data.
- The purpose and legal basis for collecting your personal data.
- How we store and secure personal data.
- Details of third parties with who we share personal data.
- What your rights are.

HOW CLINI-HUB LIMITED COLLECTS YOUR PERSONAL DATA

Personal Data is information that can be used to identify or contact a single person and refers to any information that you voluntarily submit to us, including contact information (email, telephone number, address), financial data (such as credit card details) and other information about you and/or your business (“Personal Data”). We may supplement the Personal Data provided by you with additional Personal Data gathered from public sources or from third parties who may lawfully provide such information to us. You are under no obligation to provide Personal Data, with the caveat that if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

We collect personal data about you in the following ways:

- Through and direct customer enquiries;
- By sending us emails and text messages (SMS or MMS hard copy paper agreements signed by you;



- By speaking to us in our offices or over the telephone, for example in making an enquiry about a purchase or order for supply you have made, or a complaint;
- Through forms, for example in signing up to news or offers;
- By sending us emails and text messages (SMS or MMS);
- By adding posts, reviews and other comments to any our websites, apps or other community forums;
- By interacting with us on social media platforms (such as Facebook, Twitter or LinkedIn);
- By registering accounts on any of our websites or mobile apps including setting up passwords and preferred usernames, contact details, account details, details of friends and relatives, your preferences and interests.
- By attending any marketing events that we participate in or organise.

To access and use certain areas or features of the Website, you may need to register for an on-line account. When you create an on-line account, purchase our products, contact us or participate in an online survey or competition, we may collect a variety of information, including your name, mailing address, phone number, email address, contact preferences and credit card information. You agree to (a) provide accurate, current and complete information, (b) maintain and promptly update, as necessary, your account information, (c) maintain the security of your account credentials, (d) be responsible for the acts or omissions of any third party who has authority to access or use the account on your behalf, and (e) immediately notify us if you discover or otherwise suspect any security breaches. We will only hold this data when we need to for the purposes of the products or services we provide to you or where we have a legal obligation to do so.

The Website may contain features, including without limitation, public profiles, chat rooms, forums, message boards and news groups that permit the Website user to upload, post, transmit, display, perform or distribute content, information or other, including Personal Data. Any information that you choose to disclose by means of such features becomes public information over which we are unable to exercise control. You should exercise caution when deciding to disclose Personal Data by means of such features and agree to assume all responsibility for doing so.

Use of Personal Data

In addition to the uses identified elsewhere in this Privacy Notice, we may use your Personal Data to: send information to you which we think may be of interest to you; keep you posted on our latest product announcements; update you on offers and upcoming events by post, email or other means; help us to improve your browsing experience by personalising the Website; send you marketing communications relating to our business; complete internal purposes such as auditing, administrative tasks, market mapping, data analysis and research to improve Clini-hub Limited' products, services and customer communications; send you important notices, such as communications about your purchases and changes to our terms and conditions and policies; collect payment from you when you provide credit card information; conduct a credit and fraud prevention check with a credit reference agency; provide customer services and respond to and resolve any enquiries or complaints; conduct analysis for traffic and billing management; support product development; contact you for market research purposes; conduct customer satisfaction surveys; personalise your experience on our Website; provide and conduct competitions and similar offers; use your information to administer your entry to any contest, offer, lottery,



sweepstake, or similar promotion we may offer. You can remove your consent at any time by contacting us at: compliance@clini-hub.com.

Other Disclosure. Except under the following circumstances, we will keep your Personal Data private and will not disclose it to third parties: (i) by operation of law, legal process, litigation and/or requests from public and governmental authorities within or outside your country of residence; (ii) if we determine that for the purposes of national security, law enforcement or other issues of public importance, disclosure is necessary or appropriate; (iii) transfer to a successor organisation in the event of a merger, acquisition or bankruptcy; and (iv) to strategic third party trusted partners that work with us to provide our products and services such as suppliers, marketing, social media, conducting customer research or satisfaction surveys.

You agree that any data you provide to us will be true, complete and accurate in all respects and you agree to notify us immediately of any changes to it.

Security of your Personal Data

We have implemented and maintains reasonable security procedures and practices to protect against unauthorised access, use, modification, destruction or disclosure of your Personal Data.

We store User's data on secure servers, protected from unauthorised use or disclosure. Personal Data may be transferred within the European Economic Area (EEA). Your Personal Data may also be processed by staff operating outside of the EEA, who work for us, or for one of our suppliers.

Sharing of Personal Data

We engage with other companies and people to provide products to you. Examples may include processing payments and delivery of our products.

By submitting your Personal Data, you agree to the transfer, storing and processing by us and our trusted third-party service providers of your Personal Data. We will take all reasonable steps necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Notice.

We use a variety of security technologies and procedures to help protect Personal Data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. Any transmission of data, therefore, is at your own risk.

Retention of Personal Data

We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by applicable law. We will delete this information if we have no legitimate reason to be in possession of it from our servers upon receipt of an express written request to do so.

Collection and Use of Non-Personal Data

Like most websites, our Website automatically gathers information of the sort that browsers automatically make available, including (i) IP addresses; (ii) domain servers; (iii) types of computers accessing the Website; and (iv) types of Web browsers accessing the Website (collecting "Traffic Data"). Traffic Data is



anonymous information that does not on its own, personally identify the User or permit direct association with any specific individual. If we do combine Traffic Data with Personal Data, the combined information will be treated as Personal Data for so long as it remains combined. We may collect, use, transfer and disclose Traffic Data for any purpose. The following are some examples of Traffic Data that we may collect and how we may use it:

- We may collect information such as occupation, language, area code, referrer URL, location and time zone so that we can better understand customer behaviours and improve our products, services and advertising.
- We may collect and store details of how you use our Website, including search queries. This information may be used to improve the relevancy of results provided by our services.

Cookies and other Technologies

Our Website and advertisements may use “cookies” and other technologies such as pixel tags. These technologies tell us which parts of our Website are visited and gather demographic information about our user base as a whole. We treat information collected by cookies and other technologies as Traffic Data. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered Personal Data, we will treat such identifiers as Personal Data. For further information on our Cookies Policy please see <http://www.clini-hub.com/Privacy-Policy.php>.

External Websites

Clicking on certain links within this Website may take the user to other websites. We do not control and assume no responsibility for the content or practices of websites linked on our Website. This Privacy Notice does not apply to these other websites, which are subject to any privacy and other policies they may have.

To Unsubscribe from our Communications

Users may unsubscribe from our marketing communications by sending an email to us at: clientservices@clin-hub.com.

Updated and Changes to Privacy Notice

We reserve the right, at any time and without notice, to add, update, change or modify this Privacy Notice, simply by posting such update, change or modification on this page. Any such addition, update, change or modification will be effective immediately upon posting on the Website. Your continued use of the Website, Subscription Service, and/or continued provision of Personal Data to us, will be subject to the terms of the then current Privacy Notice. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

If we are communicating with you by other means we will endeavour to notify you of changes to the policy. Please look out for notices from us within our correspondence.

Your Privacy Rights & Questions

You have several rights in relation to how we use your Personal Data. You have the right to:



- find out if we use your Personal Data, access your Personal Data and receive copies of the information we retain about you;
- request that inaccurate information is corrected and incomplete information updated;
- object to particular uses of your Personal Data where the legal basis for our use of your data is our legitimate business interests or the performance of a task in the public interest. However, doing so may have an impact on the services and products we may be able to provide;
- object to use of your Personal Data for direct marketing purposes. If you object to this use, we will stop using your Personal Data for direct marketing purposes.
- have your Personal Data deleted or its use restricted – you have a right to this under certain circumstances.
- obtain a transferable copy of certain Personal Data to which can be transferred to another provider, known as “the right to data portability”, where technically feasible.
- withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.

If you have any questions or concerns about your rights, when they apply or our Privacy Notice or data processing; wish to review the information you have supplied to us; request that we correct any errors or update your Personal Data; or if you would like to make a complaint about a possible breach of applicable privacy laws, please contact us by compliance@clini-hub.com or by postal mail to: Clini-Hub Ltd., Invent Building, Dublin City University, Collins Avenue, Dublin 9, Ireland.

We are obliged to respond within a reasonable time frame. In most instances, we will respond within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons why.

You have the right to complain to the Data Protection Commission or another supervisory authority.

You can contact the Office of the Data Protection Commissioner at:

- <https://www.dataprotection.ie/docs/Contact-us/b/11.html>
- Telephone: +353 (0)761 104 800 or Lo Call Number 1890 252 231
- Fax: +353 57 868 4757
- E-mail: info@dataprotection.ie

Postal Address: Data Protection Commission, Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois.