

## BIONICAL HEALTH PRIVACY NOTICE

1.	INTRODUCTION .....	1
2.	IMPORTANT INFORMATION AND WHO WE ARE .....	2
3.	TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU .....	2
4.	HOW WE USE YOUR PERSONAL DATA.....	4
5.	DISCLOSURES OF YOUR PERSONAL DATA .....	7
6.	INTERNATIONAL TRANSFERS.....	7
7.	DATA SECURITY .....	8
8.	DATA RETENTION .....	8
9.	YOUR LEGAL RIGHTS .....	8
10.	CONTACT DETAILS .....	10
11.	COMPLAINTS .....	10
12.	KEEPING YOUR PERSONAL DATA ACURRATE AND CURRENT .....	10
13.	THIRD-PARTY LINKS .....	11
14.	CCTV STATEMENT .....	11
15.	CHANGES TO THIS PRIVACY NOTICE .....	12

### 1. INTRODUCTION

Bionical Health Limited (“**Bionical Health**”, “**us**”, “**we**”) cares about your privacy and we are committed to being transparent about how we use it and how we protect it.

In this notice we explain how we use the personal data we collect from you when you visit our website including any data you may provide through this website when you contact us. This notice also tells you about your privacy rights and how the law protects you.

This notice applies to:

**Website visitors:** visitors and users of the websites we operate

**HCPs and business contacts:** healthcare professionals and business contacts with whom Bionical Health wish to collaborate with or who already work with Bionical Health

**Patients and Carers:** patients and their respective carers to whom we provide services to

**Customers:** representatives of our private and public sector corporate customers to whom we provide services

**Suppliers:** individual contractors and representatives of companies that provide goods and services to us

**Job Applicants:** any individual who interacts with Bionical Health via the website (including online job applicants), emails, or our call centre(s)

**Subscribers:** individuals who create an account to access training content we make available on our websites

**Visitors:** All visitors of Bionical Health premises where surveillance is installed for occupational safety and crime prevention purposes

These individuals are the data subjects of the personal data described in this privacy notice.

We have separate privacy notices for our employees.

Our websites are not intended to be used by children, and we do not knowingly collect data relating to children.

## 2. IMPORTANT INFORMATION AND WHO WE ARE

### Controller

We are Bionical Health Limited, a limited company incorporated in England and Wales (company number 15300657). We are the controller of the data processing described in this notice.

### Data protection officer

We have appointed a data protection officer (DPO) who is responsible for overseeing Bionical Health's compliance with data protection laws. If you have any questions about our processing of personal data or about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### DPO contact details

Richard Merrygold

By email: [dpo@bionicalhealth.com](mailto:dpo@bionicalhealth.com)

By post: 10 John Street, Stratford Upon Avon, CV37 6UB

Further information on making enquiries or complaints is set out in section 10 below.

## 3. TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer various kinds of personal data about you which we have grouped together as follows:

- **Account Data:** This includes details associated with accounts we make available, including support portal accounts for clients and customers, such as username, login

credentials/password, name and other details recorded in the account. This information is provided by individuals when they set up accounts, although names and email addresses may be provided by Customers to enable us to set up accounts for their representatives or invite them to create accounts.

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender nationality and citizenship obtained from a photo, photo identification document such as a passport or driving licence and proof of address document such as a bill or bank statement. We may also consult publicly available data sets such as Companies House to verify this information.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Correspondence Data:** Information we receive when people communicate with us via email, phone, post, online chat and online contact forms, including name, contact details, information contained in the communication content, communication metadata such as the time and date of the call or submission of the email, online chat query/response or online form.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us. We create records of such payment in the course of performing our contracts.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website. This information is collected automatically using technologies including cookies and server logs. See the cookie notice on the website you have visited for further information.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website, products and services such as which pages people visit and how long they spend on each page. This information is collected automatically using technologies including cookies and server logs. See the cookie notice on the website you have visited for further information.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Event Data:** Information we collect in connection with running events such as name, contact details, related organisation and access and dietary requirements, provided by or on behalf of attendees when registering for our events.
- **DEI Data:** Information relating to diversity, equity and inclusion of people with different demographics, such as ethnicity and gender. This information is provided by the individuals who attend our events or interact with us in other ways if we ask for this information.

## 4. HOW WE USE YOUR PERSONAL DATA

We only use personal data when the law allows us to. Most commonly, we use personal data to the extent it is necessary:

- For the purposes of our legitimate interests (or those of a third party) where your interests and fundamental rights and freedoms do not override those interests.
- To comply with a legal or regulatory obligation.

Occasionally, we may rely on consent as a legal basis for processing personal data where the above legal bases are not applicable. We will make it clear when we are asking for consent to process your personal data for a particular purpose.

### Purposes for which we use personal data

We have set out below the purposes for which we use personal data and the legal bases we rely on for those processing activities. Where we rely on legitimate interests as our legal basis, we have also identified what those legitimate interests are.

It's possible that more than one legal basis will apply to some of our processing purposes. Please contact us if you have any questions about the specific legal basis, we rely on to process your personal data where more than one basis has been set out in the table below.

Purpose	Type of data	Lawful basis for processing (including legitimate interest)
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract, or proposed contract, with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints, and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests, to keep our records updated and to study how customers use our products/services
To enable you to complete a survey or review	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services

Purpose	Type of data	Lawful basis for processing (including legitimate interest)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships, and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (e) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
Physical Safety and Security	To ensuring the safety and security of our employees, events, and premises	Our legitimate interest in protecting employees, events, and premises.



## **Direct Marketing**

We may use your Contact Data and Marketing and Communications Data to send you marketing communications if:

- you have specifically requested information about our products or services
- you have subscribed to one or more of our mailing lists or newsletters
- you are a representative of a customer that has previously purchased products or services from us
- you provided us with your Contact Data when you completed a survey

## **Third-party marketing**

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

## **Opting Out of Marketing**

You can opt out of receiving marketing from us when we first collect your Contact Data and at any time after that and can unsubscribe from our mailing lists at any time using the unsubscribe links in our emails or by contacting us at [dpo@bionicalhealth.com](mailto:dpo@bionicalhealth.com).

## **Cookies**

For more information about the cookies, we use and how to change your cookie preferences, please see [how-we-use-cookies](#)

## **Third-party processor**

We use the service provided by Prosopo to secure our website against unwanted automated interactions (i.e., bots and other automation threats) via our contact forms. Prosopo is designed as a protective solution that emphasizes privacy, with a focus on making automated misuse more difficult. This service processes your IP address (required for core functionality), but does not match information to a specific individual, retain personal identifiers, or create/store browser cookies.

## **Digital Marketing Service Providers**

We periodically appoint digital marketing agents to conduct marketing activities on our behalf; such activity may result in the compliant processing of personal information.

## **Change of purpose**

We will only use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. We may update this notice from time to time to reflect new processing purposes and explain the legal bases we rely on for those purposes.

## **Other purposes**

In addition to the purposes described above, we may need to process personal data for other legitimate purposes such as:

- protecting, enforcing and defending our legal rights or the rights of others;
- complying with legal obligations such as court orders for disclosure, data sharing requests from law enforcement agencies and record-keeping requirements under financial, tax and other applicable laws; and
- protecting the vital interests of individuals.

When we use or disclose personal data for these purposes, we do so in accordance with data protection laws and only use or disclose personal data to the extent necessary to achieve those purposes.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

This section sets out the circumstances in which we share personal data with third parties.

### **To our service providers**

We engage third party service providers who provide services and products that we use to carry out the purposes described in Section 3. Such service providers may host, store, access or otherwise process some of the personal data described in this notice in the course of providing their services and products. We have contracts in place with all our service providers that ensure they process personal data in accordance with data protection law, including only using personal data to the extent necessary for agreed purposes, applying appropriate security measures to protect personal data, retaining and deleting personal data in accordance with applicable law and complying with requirements under data protection law for any international transfers of personal data.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Other circumstances**

In addition, we may share personal data where it is necessary to:

- protect, enforce, or defend our legal rights or the rights of others;
- comply with legal obligations such as court orders for disclosure and data sharing requests from law enforcement agencies; or
- protect the vital interests of individuals.

## **6. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the UK.

## 7. DATA SECURITY

We implement appropriate security measures to protect the personal data we process. We also ensure our service providers apply appropriate security measures to protect the personal data they receive or have access to as a result of providing their services and products to us.

We have put in place procedures 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.

## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 without retaining personal data, and
- the applicable legal requirements relating to record keeping.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

If you want to understand the retention periods that apply to personal data relating to you, please contact our Data Protection Officer at [dpo@bionicalhealth.com](mailto:dpo@bionicalhealth.com) or the postal address set out above.

## 9. YOUR LEGAL RIGHTS

You have the following rights in respect of our processing of personal data about you (“your personal data”):

**Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of your personal data along with information about how we process that data, including our purposes for processing it, recipients of the data and the retention periods we apply to it.

**Request correction of your personal data.** This enables you to have any incomplete or inaccurate data corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data

to comply with applicable law. Note, however, that we may not always be able to comply with your erasure request for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing.** You can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) to process your personal data and there is something about your particular situation which makes you want to object to our processing on this basis. In response to your objection, we will stop the relevant processing unless we can demonstrate that we have compelling legitimate grounds to continue the processing which override your interests, rights and freedoms. You also have the right to object to us processing your personal data for direct marketing purposes, in which case we will stop processing your personal data for that purpose.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend our processing of your personal data in the following scenarios: (a) if you contest the accuracy of the personal data; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where we no longer require the personal data for our purposes but you need it to establish, exercise or defend legal claims; or (d) you have objected to our processing of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information for which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent.** You can at any time withdraw any consent you previously gave us to process your personal data for a particular purpose. If you withdraw your consent, we will no longer process your personal data for that purpose, but this will not affect the lawfulness of any processing we carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, see Contact details under Section 10.

### **No fee usually required**

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

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

We may need to request specific information from you to help us confirm your identity and verify your right to access personal data or exercise 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 assist our response

### **Time limit to respond**

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

## **10. CONTACT DETAILS**

Please contact us if you have a question about anything on this privacy notice or you want to exercise your privacy rights, please contact our DPO in the following ways:

Richard Merrygold

By email: [dpo@bionicalhealth.com](mailto:dpo@bionicalhealth.com)

By post: 10 John Street, Stratford Upon Avon, CV37 6UB

## **11. COMPLAINTS**

### **How to Raise a Data Protection Complaint**

Under the Data (Use and Access) Act 2025 (DUAA), individuals must now raise any concerns about how their personal data is handled directly with us first, before contacting the Information Commissioner's Office (ICO).

If you have any questions or concerns about how we process your personal data, or if you believe your data protection rights have not been respected, you can submit a complaint to us using the contact details set out in section 10 (Contact Details).

We will acknowledge your complaint and aim to respond within one month. If your complaint is complex or requires more time, we will keep you updated.

### **Escalating Your Complaint**

If you have raised a complaint with us and are not satisfied with our response, or if you believe we have not handled your complaint appropriately, you may then escalate the matter to the Information Commissioner's Office (ICO).

ICO contact details:

Website: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## **12. KEEPING YOUR PERSONAL DATA ACCURATE AND CURRENT**

We are required to take reasonable steps to ensure that the personal data we process is accurate and up to date. We implement internal processes to check and verify the personal data we hold. However, we also rely on individuals informing us of changes to their personal data. For this reason, please let us know if your personal data changes during your relationship with us.

### 13. THIRD-PARTY LINKS

Our websites may include links to third party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for them. If you visit such websites, we encourage you to read the privacy notice and terms of use of those websites.

### 14. CCTV STATEMENT

Bionical Health uses CCTV (Closed Circuit Television) in certain locations to record employees, contractors, and visitors to our premises.

**The Purpose Of CCTV:** Bionical Health has a legitimate interest in maintaining the security of our facilities. We also have a duty to take reasonable and appropriate steps to provide a safe and secure working environment. We deploy CCTV at our locations for the following purposes:

- Enhancing the safety of Bionical Health Personnel and visitors
- Securing Bionical Health property, information, and other assets
- Deterring and detecting unlawful behavior or behavior that materially violates Bionical Health's policy
- Responding to lawful requests from law enforcement, discovery requests, and court orders
- Defending or pursuing the legal rights of Bionical Health, including the prosecution of criminal behavior, and
- In exceptional circumstances (such as in the case of a catastrophic event with immediate impact on the life or safety of employees, such as a fire, natural disaster, violence), Bionical Health may use CCTV systems to visually monitor the health and/or behavior of personnel or other persons. Unless such use is required to support the vital interests of individuals, we will ensure there is a proper legal basis for such processing, such as prior consent.

Bionical Health CCTV systems are used to investigate incidents in connection with the above purposes and to secure evidence related to them. Our CCTV systems are not used to routinely monitor the work or office attendance habits of Personnel.

**Location Of CCTV Cameras:** CCTV cameras are located in order to monitor only those areas intended to be monitored by the equipment and to limit the capture of images or footage (e.g., street views) that are not intended to be monitored. Bionical Health will not install CCTV cameras in areas in which individuals would have an expectation of privacy such as toilets, changing rooms, etc., CCTV cameras are installed where they are visible to individuals in the area surveyed by the camera.

**CCTV Signage:** All locations that are monitored by CCTV will have appropriate signage. CCTV Camera locations.

**CCTV System Controls:** CCTV footage is stored on a secure hard drive or similar storage device and shall be maintained in accordance with the requirements of Bionical Health Information Security policies and standards. Access to the CCTV system is restricted to authorised personnel only, on a need-to-know basis. All personnel who may require access to CCTV footage on the system are trained in the proper use of the system and subject to written



confidentiality obligations to Bionical Health. A log of access to the CCTV System and the footage stored on it, and actions taken with respect to the footage or the system, will be maintained. All requests for access to footage or images are documented. All lawful requests to access CCTV footage or images must be approved by appropriate parties within Bionical Health. The exercise of rights by individuals is set out in “Your Legal Rights”. Disclosure of CCTV system footage or images to third parties will be made only in accordance with the purposes for which the CCTV system is used.

**Third parties:** Bionical Health may share CCTV footage with public authorities where this is mandated by a legal requirement.

**Retention:** Bionical Health retains CCTV footage for a maximum of 90 days or for as long as permitted in local law, unless a longer retention period is required or permitted by law (for example, to comply with legal holds). CCTV footage images will be permanently destroyed following the expiration of the Retention Period.

## **15. CHANGES TO THIS PRIVACY NOTICE**

We may make changes to this privacy notice at any time and for any reason, including to reflect changes in our processing activities or applicable law. Please review this Notice periodically to stay informed on how we are handling your personal data.

**Last updated:** June 2026