

HR-POL-004 Privacy Notice

Contents

1.	Introduction	2
2.	Controller for personal data	2
3.	What information do we collect?	2
4.	How we collect your personal data	3
5.	Information automatically collected	3
6.	How do we use your information?	3
7.	Purposes for which we will use your personal data	4
8.	Special categories of personal data.....	5
9.	Marketing Communications.....	5
10.	Will your information be shared with anyone?	6
11.	How long do we keep your information?	6
12.	How do we keep your information safe?	6
13.	International Transfers	7
14.	Do we collection information from minors?	7
15.	What are your privacy rights?	7
16.	Account Information and Your Rights	8
17.	Carrying out your data subject rights.....	8
18.	Concerns and complaints.....	8
19.	Do we make updates to this notice?	8
20.	How can you contact us about this Notice?	9

1. Introduction

Neurotherapeutics Ltd known as “Neupulse” or the “Company” respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we process your personal data on our website when you subscribe to our services and when you leave a review or rating on our website. This privacy notice also tells you about your privacy rights pursuant to the Data Protection Act 2018, UK GDPR and EU GDPR (“Data Protection Laws”).

2. Controller for personal data

A “controller” is a person or organisation who alone or jointly determines the purposes for which and the way any personal data is or is likely to be processed. Unless we notify you otherwise Neupulse is the controller of your personal data for the purpose of this website.

This privacy notice describes how we might use your information if you:

- Visit our website at <https://www.neupulse.co.uk>
- Engage with us in relation to sales, marketing or events that you may participate in
- Engage with us when you are a supplier to us

3. What information do we collect?

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. This is known as anonymised data. Anonymised data falls outside the scope of Data Protection Laws.

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

- Identity Data includes first name, last name, username or similar identifier and title
- Contact Data includes billing address, delivery address, email address and telephone numbers
- Financial Data includes bank account and payment card details
- Transaction Data includes details about payments to and from you and other details for the provision of services you have purchased from us
- 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 and other technology on the devices you use to access our website
- Profile Data includes your username and password, searches made by you, your ratings and comments, preferences, feedback and survey responses
- Usage Data includes information about how you use our website and services
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences

4. How we collect your personal data

Directly from you: You give us your personal data in your direct interactions with us. Such personal data includes Identity Data, Contact Data, Financial Data, Profile Data, Usage Data, Technical Data, Marketing and Communications Data (i) by filling in forms on our website (ii) by leaving ratings and comments (iii) by corresponding with us by email or post (iv) by calling us over the telephone.

Indirectly from you: To enhance our ability to provide relevant marketing, offers and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, as well as from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behaviour data), Internet Protocol (IP) addresses, social media profiles, social media URLs and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g. Facebook or Twitter) we receive personal information about you such as your name, email address and gender. Any personal information that we collect from your social media account depends on your social media account's privacy settings.

5. Information automatically collected

Technical Data: We may automatically collect certain information when you visit, use or navigate the website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our website and other technical information. This information is primarily needed to maintain the security and operation of our website and for our internal analytics and reporting purposes. See [Section 3](#) for further information.

Cookies and other tracking technologies: We may use cookies and similar tracking technologies like web beacons and pixels to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice. If you choose to remove cookies or reject cookies this could affect certain features or services of our website.

6. How do we use your information?

We will only use your personal data when the law allows us to. We will use your personal data in the following circumstances:

- Performance of a contract: Where we need to perform the contract, we are about to enter into or have entered into with you. For example, when you sign up to our services
- Legal obligation: Where we need to comply with a legal obligation. For example, for accounting or legal purposes
- Legitimate interests: 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
- Consent: We do not generally rely on consent as a legal basis for processing your personal data. Where we do rely on consent you have the right to withdraw consent at any time. Please contact us to withdraw consent. Please also see [Marketing communications](#)

7. Purposes for which we will use your personal data

We have set out below in a table format a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide you with our services	(a) Identity (b) Contact	Performance of a contract with you
To respond to any enquires and feedback	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To process and deliver our services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests i.e., to recover debts due to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey (c) processing your information for the purposes of managing our account and keeping it in working order.	(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 i.e., to keep our records updated and to study how customers use our products/services
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 deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests i.e., to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
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 <u>Note:</u> Where applicable consent will be used for data analytics obtained through cookies or similar technologies. See our cookies notice
To make suggestions and recommendations to you about our services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests to develop our products/services and grow our business

8. Special categories of personal data

Due to the nature of our services, we may process special categories of personal data that is information pertaining to your health and medical-related information. Where we need to process special categories of personal data we will ask for your explicit consent under Data Protection Laws.

9. Marketing Communications

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list — however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests or for other non-marketing purposes.

To otherwise opt-out, you may contact us using enquiries@neupulse.co.uk and requesting to be removed from marketing emails.

10. Will your information be shared with anyone?

We do not and will not sell any of your personal data to any third party, including your name, contact information or payment information. We may have to share your personal data with the parties set out below so that we can carry out our services to you:

- Internally: Your personal data will be used by our employees and contractors who are working on providing your services to you on a need-to-know basis.
- Suppliers: This would include service providers who support our business including IT and communication suppliers and outsourced business support to ensure our service runs smoothly.
- Professional advisers: This would include lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Law enforcement bodies, regulators and other authorities: This is to comply with our legal requirements or adhere to good practices.
- Advertising networks and analytics service providers: This is to support and display ads on our website and other social media tools.
- Third parties: This is in the context of the acquisition or transfer of any part of our business or in connection with the business reorganisation. 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 notice.

11. How long do we keep your information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than three months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible for example, because your personal information has been stored in backup archives, then we will securely store your personal information and isolate it from any further processing until deletion is possible.

12. How do we keep your information safe?

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our website is at your own risk. You should only access the website within a secure environment.

Account information: Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our

files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and / or comply with applicable legal requirements.

13. International Transfers

We may transfer and process your personal data outside of the United Kingdom / European Union to countries where data protection laws are less stringent than those in the UK / EU.

When we transfer your personal data outside of the UK / EU we only do so to entities that offer our users the same level of data protection as that afforded by Data Protection Laws.

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information; or
- We will use specific contracts approved for use in the UK or EU which give personal information the same protection it has in the UK / EU. For example, the use of Article 46 UK and EU GDPR safeguard mechanisms to transfer personal data endorsed by the UK Government or European Commission

To find out more about the transfer mechanism used please contact us.

14. Do we collection information from minors?

We do not knowingly solicit data from or market to children under 13 years (UK) or 16 years (EU). By using the website you represent that you are at least 16 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the website. If we learn that personal information from users less than 16 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 16, please contact us at enquiries@neupulse.co.uk.

15. What are your privacy rights?

In some regions like the UK and EEA you have certain rights under applicable Data Protection Laws. Some of these rights are not absolute and depends on certain circumstances. These include the right:

- (i) to request access and obtain a copy of your personal information
- (ii) to request rectification
- (iii) to erasure
- (iv) to restrict the processing of your personal information
- (v) to data portability
- (vi) to object to the processing of your personal information
- (vii) to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent

16. Account Information and Your Rights

In addition to the rights above, if you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account
- [Contact us](#) using the contact information provided

17. Carrying out your data subject rights

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. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information or to exercise any of your other rights. This is a security measure to ensure that personal information 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. 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 a number of requests. In this case, we will notify you and keep you updated.

If you wish to exercise any of the rights set out above, please [contact us](#).

18. Concerns and complaints

We would appreciate the chance to deal with your concerns in the first instance. Please see [Contact us](#) section. If you have unresolved concerns and you live or work in the UK or believe that a personal data breach happened in the UK you have the right to complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

If you live or work outside the UK or you have a complaint concerning our personal data processing activities you may lodge a complaint with another supervisory authority.

If you are a resident in the UK or EEA and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>

19. Do we make updates to this notice?

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated 'Posted' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

20. How can you contact us about this Notice?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by:

- email at enquiries@neupulse.co.uk
- post to: The Ingenuity Centre, University of Nottingham Innovation Park, Triumph Road, Nottingham, NG7 2TU