

HealthTech Scotland (“We”, ‘HealthTech Scotland’) are committed to protecting and respecting the confidentiality, integrity, and security of the personal information about individuals whose data we hold. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, and how HealthTech Scotland complies with its responsibilities under applicable data protection laws, including, when and to the extent in force, the Data Protection Act 1998, the General Data Protection Regulation (Regulation (EU) 2016/679) and the Privacy and Electronic Communications Regulations 2003 (“**Data Protection Laws**”). Please read this policy carefully.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”

means an account required to access and/or use certain areas and features of Our Site;

“Affiliate”

means in relation to a legal entity (1) its ultimate holding company (2) its subsidiaries and (3) all other subsidiaries of its ultimate holding company as the terms “subsidiary” and “holding company” are defined by Section 1159 of the Companies Act 2006 as amended;

“Cookie”

means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out below;

“Our Site”

means this website, <https://healthtechscotland.com>

“UK and EU Cookie Law”

means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015; and

“We/Us/Our”

means HealthTech Scotland, a subsidiary company of Vivolution Limited incorporated in Scotland (No. SC394194) and having its Registered Office at 2/2, 14 Mitchell Lane, Glasgow, G1 3NU trading as HealthTech Scotland and Our Affiliates.

Data Controller

For the purpose of the Data Protection Laws, the data controller is HealthTech Scotland of 2/2 14 Mitchell Lane, Glasgow, G1 3NU.

Personal data collection

We hold personal data about you which you provide to us via our website or email correspondence between you and us. Some data will be collected automatically by Our Site, other data will only be collected if you voluntarily submit it, for example, when signing up for an Account. Depending upon your use of Our Site, We may collect some or all of the following data

- name
- gender
- business/company name
- contact information such as email addresses and telephone numbers;
- demographic information such as post code, preferences and interests;
- financial information such as credit / debit card numbers;
- IP address (automatically collected);
- web browser type and version (automatically collected);
- operating system (automatically collected from our website);
- a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);

Use of personal data and legal basis for processing

All personal data we hold about you will only be used for the purposes set out below or for any other purpose specifically permitted by the Data Protection Laws or which you may authorise (which may include direct marketing, if you authorise us to do so). We use your data to provide the best possible products and services to you. This includes:

- Providing and managing your Account;
- Providing and managing your access to Our Site;
- Personalising and tailoring your experience on Our Site;
- Supplying Our products and services to you;
- Personalising and tailoring Our products and services for you;
- Responding to communications from you;
- Supplying you with email e.g. newsletters, alerts etc., that you have subscribed to (you may unsubscribe or opt-out at any time by clicking on the unsubscribe button);
- Market research;

- Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- Where you provide personal information to us, we are processing it to perform our obligations under our agreement with you or to take steps at your request prior to entering into services with you. Where you provide personal information to us, you will be asked if you consent to us adding you to our distribution list for our email newsletter and offers. If you give your consent, we are processing your information for that purpose based on your consent.

Access and other rights

You may request to view or receive copies of records held about you at any point by making a request in writing to us at 2/2 14 Mitchell Lane, Glasgow, G1 3NU. This request will be responded to within 30 working days. If we require more time to respond fully to any request, we will notify you in writing within the 30-day period referred to. You also have other rights under Data Protection Laws in relation to your personal data. In particular, you may have (i) the right to request that we rectify or erase information we hold about you in certain circumstances, (ii) the right to ask us to limit our processing of your information, (iii) the right (if we are processing information based on your consent, such as for marketing purposes) to withdraw your consent, (iv) the right to object to certain processing of your information (including the right to object to processing of your personal data for direct marketing purposes at any time), (v) the right to ask us to move, copy or transfer your personal information to another organisation. If you wish to exercise any of these rights, please contact us at The Data Protection Officer, HealthTech Scotland, 2/2 14 Mitchell Lane, Glasgow, G1 3NU.

Accuracy of personal data

HealthTech Scotland tries to ensure that personal data we hold about you is accurate and kept up-to-date. If you believe that any information we are holding about you is inaccurate, out-of-date, or incomplete, please notify us at 2/2 14 Mitchell Lane, Glasgow, G1 3NU as soon as possible. We will promptly correct or delete any information found to be incorrect.

Security

We have put in place what we consider to be appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage, to personal data.

Disclosure and sharing of your personal data

We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law. We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law. In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us. To the extent we transfer any personal data to any third party, We will only do so if that third party agrees to put in place appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, the personal data.

Transferring personal data outside the EEA

Some or all of your data may be stored or transferred outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store or transfer data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the Data Protection Act 1998 and General Data Protection Regulation (Regulation (EU) 2016/679). Such steps may include, but not be limited to, the use of legally binding contractual terms between Us and any third parties We engage and the use of the EU-approved Model Contractual Arrangements.

Change of Business Ownership

We may, from time to time, expand or reduce Our business and this may

involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us. In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

Retention of personal data

HealthTech Scotland only keep your data for as long as We need to in order to use it as described above in section **"Use of personal data and legal basis for processing"**, and/or for as long as We have your permission to keep it, after which they will be destroyed. We will take all reasonable steps to destroy, or erase from our systems, all personal data which is no longer required. Please note that you may contact us at any time at 2/2 14 Mitchell Lane, Glasgow, G1 3NU and ask for your details to be removed (please refer to the section headed **"Access and other rights"** above). We may not be able to continue to provide you with our services in the event you request that your details are removed.

Cookies

We may use "cookies" from time to time on our website. Otherwise known as a type of tracking software, a cookie is a small, unique text file that is sent to your browser from a web server and stored on your computer's hard drive. Cookies will help our web site tailor the information presented to you based on your preferences by collecting information such as which areas of the web site you have visited and for how long, so the next time you visit the site, those pages may be readily accessible. Cookies will also allow us to collect statistical information such as countries of origin, search engines used, how many visitors download files and which files these were. We will also be able to study how visitors navigate around the site and this will help us manage and improve the site where necessary. A cookie cannot read data off your hard disk or read cookie files created by other sites and cookies do not damage your system. You can choose whether to accept cookies by changing the settings on your browser so that it rejects them or notifies you when a web site tries to send you a cookie. Rejecting cookies may affect the scope of your enjoyment of a web site and may mean that some features do not operate as intended. We do not use single-pixel gif images, sometimes referred to as "web bugs" or "web beacons". By using Our Site you may also receive certain third-party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us.

We use third party Cookies on Our Site for advertising services. In addition, Our Site uses analytics services provided by Google Analytics, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site.

Changes to this policy

We may make changes to this data protection policy at any time. Any changes we make will be notified to you in writing. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Contact

If you have any queries about this policy or your data, or you wish to submit an access request or raise a complaint about the way your personal information has been handled, please do so in writing and address this to The Data Protection Officer, HealthTech Scotland, 2/2 14 Mitchell Lane, Glasgow, G1 3NU. If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data not in accordance with the Data Protection Laws you can complain to the Information Commissioner's Office (<https://ico.org.uk/>).