

## **PRIVACY POLICY**

This webpage sets out when and how we use your personal information that you or others provide to us.

### **WHO WE ARE**

We are Joint Analytics Limited, a limited company (registered with number 10926742).

Our registered address is The Old Bank, 205-207 High Street, Cottenham, Cambridge, CB24 8RX.

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our data protection officer (Dr Thomas Stone) by email at [dataprotection@jointanalytics.com](mailto:dataprotection@jointanalytics.com)

### **HOW DO YOU USE MY DATA?**

#### **When you Register**

When you register to use Joint Analytics services, we will use your personal information to process your registration and provide you with your registration information and benefits. The details we collect from you when you register include your Name, date of birth, gender, email address, contact phone number.

We need to process your personal information in this way to register you as a client and provide the ongoing services and benefits to you.

#### **When you attend a licensed Joint Analytics Movement Clinic.**

When you attend a Joint Analytics licensed clinic we will share your personal information with the clinic to enable the clinic to collect the appropriate movement data from you. The details we will share with the clinic includes your name, gender, age, email address, payment method, and any special requirements such as mobility support.

We need to use your personal information in this way to complete the booking contract between us.

#### **When you book an appointment using our website**

When you book an appointment to attend a movement clinic using our website we will use your personal information to complete your booking. The details we collect from you will include your name, email address, phone number and payment details.

To complete your booking, we share your personal information with the movement clinic at which you have booked to attend. We need to use your personal data in this way, so the movement clinic is able to provide the movement data collection service to you.

To complete your booking we share personal information with our subcontractors who are involved in the booking process, such as payment providers.

We need to use your personal information in this way to enter into and complete the booking contract between us.

#### **When you phone or email us**

When you phone us or contact us by email with general queries, we may also handle your personal

information (your name, contact details and the other details you provide to us) in order to provide the customer services you have asked us to. This could be when you ask us to provide more information about your Appointment and what will happen during a movement scan, how we will report the results and who will have access to those results, or explain how our movement scan service works.

When you phone us or contact us by email with specific enquiries about your use of Joint Analytics services we will use your personal information (your name, contact details and other details you provide us) in order to answer your specific questions.

We need to use your personal information in this way to ensure we protect your privacy when discussing your use of Joint Analytics services.

We rely on your consent to handle your personal information in this way. If you do not provide us with the personal information we request from you for customer services purposes, we may not be able to fully answer your queries.

**When you have expressed an interest in Joint Analytics Limited services:**

This section applies if you have opted in to receive marketing communications from us.

We will handle your personal information (such as your name, email address, postal address, telephone number and sector preferences) to provide you with marketing communications in line with any preferences you have told us about.

When we send you marketing emails because you have opted-in to receive them, we rely on your consent to contact you for marketing purposes.

Every email we send to you for marketing purposes will also contain instructions on how to unsubscribe from receiving them.

You are not under any obligation to provide us with your personal data for marketing purposes.

You can tell us that you do not want your personal information to be processed in this way at any time by contacting us at [contact@jointanalytics.com](mailto:contact@jointanalytics.com) or, where relevant, by following the unsubscribe link shown in every marketing communication you receive from us.

**To make our site better:**

We will also use your personal information to provide you with a more effective user experience (such as by displaying information and news about Joint Analytics services we think you will be interested in).

Our use of your information in this way means that your experience of our site will be more tailored to you, and that the information and news about Joint Analytics services you see on our site may differ from someone accessing the same site with a different history or browsing habits.

We will also use your personal information for the purposes of making our site more secure, and to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

We process your data for this reason because we have a legitimate interest to provide you with the best experience we can, and to ensure that our site is kept secure.

You can prevent us from using your personal information in this way by using the 'do not track' functionality in your internet browser. If you enable do not track functionality, our site may be less tailored to your needs and preferences.

### **If our business is sold:**

We will transfer your personal information to a third party:

- if we sell or buy any business or assets, we will provide your personal information to the seller or buyer (but only to the extent we need to, and always in accordance with data protection legislation); or
- if Joint Analytics Limited or the majority of its assets are acquired by somebody else, in which case the personal information held by Joint Analytics Limited will be transferred to the buyer.

We process your personal information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal information in this way, the relevant seller or buyer of our business may not be able to provide services to you.

In some circumstances we may also need to share your personal information if we are under a duty to disclose or share it to comply with a legal obligation.

### **WHAT ABOUT TECHNICAL INFORMATION AND ANALYTICS?**

**Information we collect about you:** When you visit our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators, clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

**Information we receive from other sources:** We are also working closely with third party advertising networks, analytics providers, hosting providers and search information providers from whom we may also receive general aggregated anonymous information about you.

We will combine the information you provide to us with information we collect about you.

### **COOKIES**

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

Cookie	Purpose
apiAccessToken	This is unique to the user session. It is used for authorising access to our API
apiRefreshToken	This is unique to the user session. It is used for updating the apiAccessToken if it expires
apiUser	To identify the active user
apiActiveRole	To identify the active role of user; a user can have many roles

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, which we do not have any control over. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after 2 years.

## WHERE IS MY DATA STORED?

We (and many of our external third parties) are based outside the European Economic Area (**EEA**) so their processing of your personal information will involve a transfer of data outside of the EEA.

Whenever we transfer your personal information outside of the EEA, we ensure it is protected by making sure at least one of the following safeguards is in place:

- by transferring your personal information to a country that has been deemed to provide an adequate level of protection by the European Commission;
- by using specific contracts approved by the European Commission which give your personal information the same protection it has
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

To keep this privacy policy as short and easy to understand as possible, we have not set out the specific circumstances when each of these protection measures are used. You can contact us at [contact@jointanalytics.com](mailto:contact@jointanalytics.com) for the details as to how we protect specific transfers of your data.

All information you provide to us is stored on our secure servers or those of our third party data storage providers.

## HOW LONG DO WE RETAIN YOUR DATA FOR?

Where you are a registered client of Joint Analytics Limited, we will retain your data for a period of 8 years after your last scan, to ensure that we are able to assist you should you have any questions, feedback or issues in connection with your registration or if any legal issues arise.

Where we have used your personal information to contact you for marketing communications, if you have opted-in:

- we will contact you at least every 12 months to ensure you are happy to continue receiving electronic communications; or

If you tell us that you no longer wish to receive marketing communications from us, we promise to stop sending them to you.

Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with your scan results) we will retain your data for 8 years following that contact.

Where we have shared personal information with movement clinics for the purpose of delivering movement data collection services, movement clinics will not retain personal information after the completion of your movement scan.

In some circumstances (such as for your movement data) 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.

## YOUR RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

You have the right to object to us handling your personal information when:

- we are handling your personal information based on our legitimate interests (as described in the “How do you use my data” section above). If you ask us to stop handling your personal information in this way, we will stop unless we can show you that we have compelling grounds as to why our use of your personal information should continue; or
- for marketing purposes. If you ask us to stop handling your personal information on this basis, we will stop.
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## WHAT ARE MY RIGHTS UNDER DATA PROTECTION LAWS?

You have various rights under the data protection laws, which you can exercise by contacting us. The easiest way to do this is by email at [dataprotection@jointanalytics.com](mailto:dataprotection@jointanalytics.com).

### Right of access

You are entitled receive confirmation as to whether your personal information is being processed by us, as well as various other information relating to our use of your personal information.

You also have the right to access your personal information which we are handling.

### Right to rectification

You have the right to require us to rectify any inaccurate personal information we hold about you. You also have the right to have incomplete personal information we hold about you completed, by providing a supplementary statement to us.

### **Right to restriction**

You can restrict our processing of your personal information where:

- you think we hold inaccurate personal information about you;
- our handling of your personal information breaks the law, but you do not want us to delete it;
- we no longer need to process your personal information, but you want us to keep it for legal reasons; or
- where we are handling your personal information because we have a legitimate interest (as described in the “How We Use Your Data” section above and are in the process of objecting to this use of your personal information.

Where you exercise your right to restrict us from using your personal information, we will then only process your personal information when you agree, except for storage purposes and to handle legal claims.

### **Right to data portability**

You have the right to receive your personal information in a structured, standard machine-readable format and to send this to another organisation controlling your personal information.

This right only applies to your personal information we are handling because you consented to us using it or because there is a contract in place between us.

### **Right to erasure**

You have the right to require us to erase your personal information which we are handling in the following circumstances:

- where we no longer need to use your personal information for the reasons we told you we collected it for;
- where we needed your consent to use your personal information, you have withdrawn your consent and there is no other lawful way we can continue to use your personal information;
- when you object to our use of your personal information and we have no compelling reason to carry on handling it;
- if our handling of your personal information has broken the law; and
- when we must erase your personal information to comply with a law we are subject to.

### **Right to complain**

You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory

authority for data protection issues in England and Wales.

### **WHAT ABOUT WEBSITES WE LINK TO?**

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates.

Our site connects you to different websites. If you follow a link to any of these websites or use our services, please note that you have left our site and these websites have their own privacy policies.

We do not accept any responsibility or liability for these policies or websites. Please check their policies before you submit any personal information to these websites.

### **WHEN WILL YOU CHANGE YOUR PRIVACY POLICY?**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or post.

Please check back frequently to see any updates or changes to our privacy policy.

### **HOW DO I CONTACT YOU WITH FEEDBACK?**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@jointanalytics.com](mailto:info@jointanalytics.com)

This privacy policy was last updated on 10<sup>th</sup> October 2019.