

## **ELAROS 24/7 Limited PRIVACY POLICY**

### **INTRODUCTION**

Welcome to ELAROS 24/7 Limited's (ELAROS) privacy policy. This privacy policy will tell you: -

- how we look after personal data when you deal with us or visit our website at <https://elaros.com> (**Our Website**) If you use another app, website or cloud-based software that we provide, please consult the relevant privacy policy for that service.
- about your privacy rights
- how the law protects you.

ELAROS respects personal privacy and is committed to protecting personal data and fully complying with its legal obligations under the General Data Protection Regulation ('GDPR') and the Data Protection Act ('DPA') 2018.

### **1. Purpose of This Privacy Policy**

This privacy policy aims to give you information about how ELAROS collects and processes personal data when you; deal with us, use **Our Website**, or you use another app, website or cloud-based software that we provide.

### **2. Who are ELAROS?**

ELAROS 24/7 Limited (ELAROS) is a company which was incorporated on the 14 December 2010 in England and Wales under No. 07469411 and whose registered office is at Electric Works, Sheffield Digital Campus, Sheffield, S1 2BJ. The business of ELAROS is the development of health technologies, health apps, clinical web portals and clinical assessment tools.

### **3. Contacting ELAROS**

You can contact ELAROS by writing to us at the above address or by calling us on 0114 286 6200.

For general email enquiries you can contact us at [hello@elaros.com](mailto:hello@elaros.com), and for any questions relating to this privacy policy you can contact us at [dpo@elaros.com](mailto:dpo@elaros.com).

### **4. Who is responsible for the management of data protection at ELAROS?**

Our internal *Regulatory Affairs Manager* is responsible for the management of data protection at ELAROS. The Regulatory affairs manager also works closely with our independent data protection officer.

All ELAROS staff members receive data protection and cybersecurity training at least once annually.

You may contact us with any questions you may have in relation to this privacy policy and data-related queries at [dpo@elaros.com](mailto:dpo@elaros.com).

ELAROS provides various digital solutions (apps and cloud-based software), each of which has a dedicated website and respective policies that detail the types of data collected for the solution and the purposes for data collection and processing.

For more information on a particular ELAROS solution, please visit the relevant website or product page from <https://www.elaros.com/solutions/>.

## 5. Personal data we hold and collect

Personal data means any information about an individual (a data subject) from which that person can be identified. It does not include data from which the identity of an individual cannot be identified (anonymous data).

Almost all the personal data we process relates to users of our apps, websites or cloud-based software that we provide to patients, including clinical teams, research teams, and other end users, depending on which solution is being used.

ELAROS hosts its apps, websites and cloud-based software through trusted third-party hosting providers which may collect personal data relating to the users (**User Personal Data**) of such systems of the following types:

- **Identity Data** including, for example, people's first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** including, for example, people's address, billing, delivery or email address and people's mobile and landline telephone numbers.
- **Technical Data** including, for example, internet protocol (IP) addresses, people's login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technology on the devices people use to access our websites.
- **Profile Data** including, for example, people's username and password, purchases or orders made by people, people's interests, preferences, feedback and survey responses.
- **Usage Data** including, for example, information about how people use **Our Website**.
- **Marketing and Communications Data** including, for example, people's preferences in relation to receiving marketing communications.

Our access to **User Personal Data** is strictly limited and can vary depending on which of our solutions is being used. For policies relating to the collection, storage and management of data for a particular ELAROS solution, please visit the relevant website or product page from <https://www.elaros.com/solutions/>.

- In addition, ELAROS holds personal data relating to users who visit **Our Website (User Personal Data)**. In relation to users who visit **Our Website** we only hold non-identifiable **Technical Data**. In relation to all **User Personal Data** ELAROS is, for the purposes of data protection legislation, the controller. A controller is a "natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data". In short, we determine why such personal data is being processed and how.

## 6. How we collect personal data

We use different methods to collect **User Personal Data** from and about our clients and potential clients who visit **Our Website** including the following:-

**Direct interactions.** Users may give us their Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This

includes personal data our clients provide when they become users of ELAROS or give us feedback or contact us.

**Automated technologies or interactions.** As visitors interact with **Our Website**, we may automatically collect **Technical Data** about their equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. Where cookies are used, user consent will be sought prior to obtaining any personal data relating to such users by their use.

## **7. How we use personal data**

We will only process personal data when the law allows us to.

In relation to **User Personal Data**, we will only use your personal information to:

- Provide ELAROS services to you
- Respond to your requests, enquiries, comments or concerns relating to any of the systems we provide
- Enable you to personalise ELAROS services and to select content you want to access or to share with a third party
- Notify you about changes or updates to ELAROS and other products and services we provide ourselves or through third parties
- Provide you with special offers and other information about related events, products and services and to invite you to participate in surveys, promotions and conversations, as determined by your choices and communications preferences
- Evaluate and improve ELAROS and other products and services to develop new products or services
- Identify and analyse usage trends and determine the effectiveness of our promotional campaigns
- Provide technical, product and other support and help keep ELAROS services working, safe and secure; and
- Comply with our legal obligations

We may also combine the personal information that you provide with information that we obtain from other sources or that already exist in our records for the purposes described above. Any use of your personal information for a purpose other than those described in this privacy policy will require your express consent.

## **8. How we store your data**

ELAROS securely stores your data through its third-party hosting providers relevant to the systems which users interact with. For more information on storage policies for data collected by our products and websites, visit the respective product websites.

## **9. Marketing**

We won't share **User Personal Data** with any third party for marketing purposes without first obtaining the User's permission. Our users can ask us or third parties to stop sending them marketing messages at any time by following the opt-out links on any marketing message sent to them or by contacting us at any time.

## 10. Your data protection rights

ELAROS would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to access** – You have the right to request ELAROS to provide copies of your personal data. We may charge you a small fee for this service.

**The right to rectification** – You have the right to request that ELAROS corrects any information that you believe is inaccurate. You also have the right to request that ELAROS completes information you believe is incomplete.

**The right to erasure** – You have the right to request that ELAROS erases your personal data, under certain conditions.

**The right to restrict processing** – You have the right to request that ELAROS restricts the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to ELAROS processing your personal data, under certain conditions.

**The right to data portability** – You have the right to request that ELAROS transfers the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us on email: [dpo@elaros.com](mailto:dpo@elaros.com)

Call us at: 0114 286 6200

Write to us at: Electric Works, Sheffield Digital Campus, Sheffield, S1 2BJ

## 11. What are cookies?

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

## 12. How we use cookies

The ELAROS website ([www.elaros.com](http://www.elaros.com)) does not currently use cookies to track users. This may change in the future, in which case we will obtain user consent prior to obtaining any personal data relating to such users by their use and publish a separate cookie policy. ELAROS' other websites or systems may use cookies, as described in their respective privacy policies.

## 13. Privacy policies of other apps, websites or cloud-hosted systems

**Our Website** may contain links to other websites. This privacy policy applies only to our website or systems that are not covered by a separate privacy policy, so if you click on a link to another website, you should read their privacy policy.

## 14. Changes to our privacy policy

ELAROS keeps its privacy policy under regular review and places any updates on its home web page. This privacy policy was last updated on 31 August 2023.

## **15. How to contact us**

If you have any questions about ELAROS' privacy policy, the data we hold about you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us on email: [dpo@elaros.com](mailto:dpo@elaros.com)

Call us at: 0114 286 6200

Write to us at: Electric Works, Sheffield Digital Campus, Sheffield, S1 2BJ

## **16. Contacting the regulator to make a complaint**

Data subjects have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority in relation to data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). If a data subject feels that their data has not been handled correctly, or is unhappy with our response to any requests that they have made to us regarding our use of their personal data, they have the right to lodge a complaint with the Information Commissioner's Office. We would, however, appreciate the chance to deal with any such concerns before you approach the ICO so please contact us in the first instance.

The ICO can be contacted by calling 0303 123 1113 or by going online at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

If a data subject is based outside the UK, they have the right to lodge a complaint with the relevant data protection regulator in their country of residence.

## **19. Further information**

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

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