

# OPEN Health

## Privacy Notice for Users of AXON 360

Last Updated: 05 April 2022

### Introduction

OPEN Health and its affiliates, subsidiaries and related entities (“OPEN Health”, “we, “our”) is committed to protecting the privacy and security of the personal data we collect about end customers and users of our services (“you/your”).

The purpose of this privacy notice is to explain what personal data we collect about you when logging into, and using the AXON 360 system. When we do this, we are the data controller.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice you can contact us using the information provided below or by emailing us at [add email].

### Personal data we collect

Name  
Work email address

N.B. These details are provided by your employer in order to access the AXON 360 service provided by Harvey Walsh Ltd.

### Purposes for which we use personal data and the legal basis

When providing services to you, we may use your personal data for the following purposes and on the following lawful bases:

Purpose	Lawful Basis for Processing
Accessing the AXON 360 system	GDPR article 6 (1) (f)
User statistics – limited to name, date registered, client name, count of logins	GDPR article 6 (1) (f)

Where personal data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

## Sharing your data

It is unlikely that we'll ever share your personal data outside the European Union or European Economic Area. If, however, it becomes necessary for the purposes of providing our services to you, we will only share it with organisations in countries benefiting from a European Commission adequacy decision or on the basis of Standard Contractual Clauses approved by the European Commission which contractually oblige the recipient to process and protect your personal data to the standard expected within the EU/EEA.

## How long we keep your data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

## How we protect your data

We implement appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction.

## Your rights and options

You have the following rights in respect of your personal data:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you can object to us doing so.
- You can ask us to restrict the use of your personal data if:
  - It is not accurate.
  - It has been used unlawfully but you do not want us to delete it.
  - We do not need it any-more, but you want us to keep it for use in legal claims; or

- if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
- In some circumstances you can compel us to erase your personal data and request a machine-readable copy of your personal data to transfer to another service provider.
- You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, please contact us at [add email].

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at: <https://ico.org.uk/concerns/>.

## Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact:

Data Privacy

The Weighbridge

Brewery Courtyard

High Street

Marlow

SL7 2FF

United Kingdom

Alternatively, you can email us at [dataprivacy@openhealthgroup.com](mailto:dataprivacy@openhealthgroup.com)

## Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified May 2021. You can find previous versions of this notice hereby contacting [dataprivacy@openhealthgroup.com](mailto:dataprivacy@openhealthgroup.com)