

Privacy Policy - GDPR

Section 1: Introduction

We are Hootvox Limited, a UK company which is registered with the UK Information Commissioner on the Data Protection Public Register with the registration number: ZA159362. The purpose of the privacy policy is to inform you as a user of Hootvox about what information we collect when you visit the service, how we use the information, whether the information is disclosed and the ways in which we protect users' privacy. We want you to feel secure when using the website and associated services. We are committed to respecting your privacy. Below we give an overview of how we do that.

This Policy explains:

- the types of personal information that we collect or receive from companies that we work for, and what we do with that information;
- when and why we will share personal information with other organisations;
- how and why we use cookies;
- the measures that we take to protect your data; and your rights and choices when it comes to your personal information.

Please note that the types of personal information that we collect and receive, and the way that we use and share that data, will depend on how you interact with Hootvox.

- Reviews / Patient Feedback – this is where you provide a review or other content relating to your experience in response to an email or text message that we send on behalf of one of the companies that we work for.

Please also note that our website and emails may contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read

their terms and conditions and privacy policies carefully before providing any personal information on their websites and mobile apps, as we cannot be responsible for the way that they deal with your personal information.

If you have any questions or concerns about this Policy or the way that Hootvox collects and uses your personal information, please contact us at privacy@hootvox.com or by writing to us at Grunjy Coth, Gilly Gabben, Mawgan, Cornwall TR12 6BB.

Section 2: The types of personal information that we collect or receive, what we do with the information, and how long we keep it.

We process all your personal information in accordance with local data protection and privacy laws.

Companies ask us to collect and display users feedback on their behalf about services that their customers have used or purchased from them. We do this by sending their customers an email on behalf of the company with a request that the customer completes a questionnaire about the service that they have bought, or provides a description of their experience of the service and dealing with the company. In order for us to be able to send these emails on behalf of the company, the company will provide us with the email addresses, mobile phone number, post code and names of those of their customers for whom they legally are allowed to have us contact them. The company does not provide us with any other personal information, so for example we never receive the customers' full addresses or personal payment details such as credit card numbers.

We delete all the personal information that we hold about you (that is, email addresses, phone number, post code and first names) from our database as follows:

1. If you choose not to complete a questionnaire about the product or service, we delete your personal information within 60 days of the date that we emailed you.

2. If you provide your opinion and/or other content in response to the questionnaire, we delete your personal information within 3 years of the date that the content was submitted.

Please note, however, that when providing these services on behalf of one of the companies that we work for, the company remains the “data controller”, i.e. they are primarily responsible for your personal information, and if you have any questions or concerns about the information that they hold about you or the way that they use that information (including the fact that they have shared your personal information with us and asked us to contact you), then please refer to their privacy policy or contact them directly.

Section 3: When and why we share your personal information with other organisations

All the data that we collect, including your encrypted personal information, is stored on our behalf by TSOHOST, a global cloud storage provider.

We use Emailcenter, a third party email service provider, to send our emails. Emailcenter are required to delete all email addresses from their system within 14 days after the emails have been sent.

We may from time to time share your personal information with other third party services providers, but we will always ensure that all third parties with whom we share your personal information have appropriate technical and organisational measures in place to protect your personal information, and that they comply with all applicable data protection laws.

We may disclose your personal information to any relevant authority if we are required to do so by law, or if we think the disclosure is appropriate. We may also disclose your personal information in connection with actual or potential legal proceedings: (a) if we are required to do so by law; or (b) if such disclosures may potentially reduce our liability; or (c) to enforce our rights.

Section 4: How and why we use cookies

What information do we collect when you use Hootvox. We collect information indirectly and directly when you use Hootvox - www.hootvox.com we use technology to collect information indirectly - such as your internet (IP) address. This is commonplace across all internet services to enable the investigation of issues such as malicious use. This information is then kept in our internet access logs. We collect information directly from you in a number of ways. One way is by using cookies. Cookies are small files of information that save and retrieve information about your visit to our site, such as how you entered our site, how you navigated through the site and what information was of interest to you. This information is collected for a number of reasons, for example, to help develop the website and associated services. The cookies we use identify you merely as a number. If you are uncomfortable about the use of cookies, you can disable them by changing the settings in the preferences or options menu in your internet browser. However, disabling cookies may affect our ability to provide services to you; if certain cookies are disabled you may not be able to access the service.

See our Cookies policy for more information on the cookies we use. We also collect information when you give it to us. For example, you may (as a company) register to use Hootvox. When we collect this type of information, we will notify you as to why we are asking for information and how this information will be used. It is completely up to you whether you provide it, but not providing information may affect our ability to provide services to you. The social media bookmarking sites that Hootvox links to are third-party sites and Hootvox does not control the way these sites use your information. If you choose to access these sites using the links provided, the operators of these sites may collect information from you that may be used by them in accordance with their privacy policies, which may differ from ours. You should read their privacy policies carefully to find out what happens to any information that is

collected by these services when you use them. Information submitted as a part of Hootvox content held on Twitter and Facebook will be subject to their privacy policies. For more information, see the Twitter privacy policy and the Facebook privacy policy

Section 5: How we protect your information

- Anonymisation and encryption: When we store, transmit and otherwise process your personal information such as email addresses and mobile phone numbers, we make extensive efforts to protect that information from unauthorised access, disclosure, alteration, and destruction and to make sure that anyone with whom we share your personal information do the same. These steps include the use of firewalls, network-layer encryption such as SSL and dedicated monitoring systems. We also limit access to personal information to only those employees who we believe reasonably need to have access to that information to provide products or services to you or in order to do their jobs.
- No guarantee: No data transmissions over the internet can be guaranteed to be 100% secure. We cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your transmission, we make reasonable efforts to ensure security on our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered or destroyed.
- Notification: If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice on our website if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Section 6: Your rights and choices when it comes to your personal information

This section deals with your rights in relation to personal information that we hold as the data controller. As explained in Section 2 above, where we have received your information from a company that we work for then that company will be the data controller and you should contact them directly if you have any questions or concerns about the way that your personal information is being used.

How to withdraw your consent

You can withdraw your consent to our holding your personal information at any time by clicking the opt out/unsubscribe link at the bottom of any of the emails you've received from us, or by telling us on privacy@hootvox.com or by writing to us at Grunjy Coth, Gilly Gabben, Mawgan, Cornwall TR12 6BB. If you withdraw your consent, we may not be able to provide certain services to you.

Telling us that your personal information is incorrect

If you think that any information we have about you is wrong, incomplete or out of date, then you have the right to request that we look into and, if necessary, rectify it. If you want to do this, please contact us on privacy@hootvox.com or write to us at Grunjy Coth, Gilly Gabben, Mawgan, Cornwall TR12 6BB.

How to get a copy of your personal information

If you want a copy of all the personal information that we have you about you, then you can ask us to provide this on privacy@hootvox.com or by writing to us at Grunjy Coth, Gilly Gabben, Mawgan, Cornwall TR12 6BB.

You can also get a copy of certain personal information as a digital file, so you can keep and use it yourself, and give it to other organisations if you want to. Again, please contact us on privacy@hootvox.com or by writing to us at Grunjy Coth, Gilly Gabben, Mawgan, Cornwall TR12 6BB.

Right to object

You can object to us keeping or using your personal information (known as the 'right to object') if:

- The information is not accurate
- The information has been used unlawfully but you don't want us to delete it
- The information is not relevant any more, but you want us to keep it for use in legal claims
- You have already asked us to stop using your information but you are waiting for us to tell you if we are allowed to keep on using it.

Please contact us on privacy@hootvox.com or by writing to us at Grunly Coth, Gilly Gabben, Mawgan, Cornwall TR12 6BB. if you would like to object to us keeping or using your personal information.

Right to restrict processing of personal information

You can request us to restrict processing your personal information if you believe that:

- Any of the information that we hold about you is inaccurate
- We no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or
- We are not using your information in a lawful manner.

If you would like us to restrict the processing of your personal information, then please contact us on privacy@hootvox.com or write to us at Grunly Coth, Gilly Gabben, Mawgan, Cornwall TR12 6BB.

Right to be forgotten

You can also ask us to delete, remove, or stop using your personal information if, for example, you don't want us to send you any emails (known as the 'right to erasure' or the 'right to be forgotten'). Please note that there may be legal or other official reason why we may need to keep or use your information for certain limited purpose.

If you would like to exercise your right to be 'forgotten' and for Hootvox to stop using and to delete your personal information, then please click the opt out/unsubscribe link at the bottom of any of the emails you've receive from us, or

contact us on privacy@hootvox.com or write to us at Grunjy Coth, Gilly Gabben, Mawgan, Cornwall TR12 6BB.

How to complain

Please let us know if you are unhappy with how we have used your personal information by contacting us on

privacy@hootvox.com.

You also have the right to complain to the Information Commissioner's Office. You can find out how to report a concern at <https://ico.org.uk/concerns/>.

Hootvox Limited takes data protection very seriously all data is anonymised and email addresses are encrypted to ensure safety for our partners and their clients. All information is securely held and we only hold information that is essential to our business. We do not hold credit card details or any financial information.

Hootvox Limited, Company Number 9234975