

## **1.0 Privacy Policy:**

Odin Vision is committed to safeguarding your privacy. Contact us at [dataprotection@odin-vision.com](mailto:dataprotection@odin-vision.com) if you have any questions or problems regarding the use of your Personal Data and we will gladly assist you. By using this site and/or our services, you consent to the Processing of your Personal Data as described in this Privacy Policy.

This Privacy Policy is a part of our Terms and Conditions; by agreeing to Terms and Conditions you also agree to this Policy. In the event of a collision of terms used in Terms and Conditions and Privacy Policy, the latter shall prevail.

## **2.0 Definitions and Abbreviations:**

Personal Data – Any Information relating to an identified or identifiable natural living person.

Processing – Any operation or set of operations which is performed on Personal Data or on sets of Personal Data

Data subject – A natural living person whose Personal Data is being processed

Child – a natural living person under 16 years of age.

We/us – Odin Medical Ltd. trading as Odin Vision Ltd.

## **3.0 Data Protection Principles:**

We promise to follow the following data protection principles:

- Processing is lawful, fair, transparent. Our Processing activities have lawful grounds. We always consider your rights before Processing Personal Data. We will provide you information regarding Processing upon request.
- Processing is limited to the purpose. Our Processing activities fit the purpose for which Personal Data was gathered.
- Processing is done with minimal data. We only gather and Process the minimal amount of Personal Data required for any purpose.
- Processing is limited with a time period. We will not store your personal data for longer than needed.
- We will do our best to ensure the accuracy of data.
- We will do our best to ensure the integrity and confidentiality of data.

## **4.0 Data Subject's Rights**

The Data Subject has the following rights:

- Right to information – meaning you have the right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
- Right to access – meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your Personal Data gathered.
- Right to rectification – meaning you have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.

- Right to erasure – meaning in certain circumstances you can request for your Personal Data to be erased from our records.
- Right to restrict processing – meaning where certain conditions apply, you have the right to restrict the Processing of your Personal Data.
- Right to object to processing – meaning in certain cases you have the right to object to Processing of your Personal Data, for example in the case of direct marketing.
- Right to object to automated Processing – meaning you have the right to object to automated Processing, including profiling; and not to be subject to a decision based solely on automated Processing. This right you can exercise whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
- Right to data portability – you have the right to obtain your Personal Data in a machine-readable format or if it is feasible, as a direct transfer from one Processor to another.
- Right to lodge a complaint – in the event that we refuse your request under the Rights of Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled please contact us.
- Right for the help of supervisory authority – meaning you have the right for the help of a supervisory authority and the right for other legal remedies such as claiming damages.
- Right to withdraw consent – you have the right withdraw any given consent for Processing of your Personal Data.

## **5.0 Data we gather**

### **5.1 Information you have provided us with**

This might be your e-mail address, name, billing address, home address etc – mainly information that is necessary for delivering you a product/service or to enhance your customer experience with us. We only collect this information when you expressly provide it to us in a contact form or similar.

### **5.2 Information automatically collected about you**

This includes information that is automatically stored by cookies and other session tools. For example, pages visited on our website, your IP address, your shopping history (if there is any) etc. This information is used to improve your customer experience. When you use our services or look at the contents of our website, your activities may be logged. More information about cookies and how we use them see the cookie section below.

### **5.3 Information from Healthcare Providers**

We gather information from Healthcare Providers with confirmation that they have legal grounds to share that information with us. This is either information you have provided them directly with or that they have gathered about you on other legal grounds.

## **6.0 How we use your Personal Data**

We use your Personal data under the Legal Bases of: Contract, Legitimate Interest and Consent.

On the grounds of entering into a contract or fulfilling contractual obligations, we Process your Personal Data for the following purposes:

- to identify you;

- to communicate in response to your queries;
- to enhance your customer experience;
- to provide you a service or to send/offer you a product; and
- to communicate either for sales or invoicing.

On the ground of legitimate interest, we Process your Personal Data for the following purposes:

- to send you personalised offers (from us and/or our carefully selected partners);
- to administer and analyse our client base (purchasing behaviour and history) in order to improve the quality, variety, and availability of products/ services offered/provided;
- to conduct questionnaires concerning client satisfaction; and
- to provide accurate well thought out answers to your queries.

We Process your Personal Data in order to fulfil obligations rising from law and/or use your Personal Data for options provided by law. We reserve the right to completely anonymise Personal Data gathered and to use any such anonymised data. We will use data outside the scope of this Policy only when it is anonymised.

We might process your Personal Data for additional purposes that are not mentioned here but are compatible with the original purpose for which the data was gathered. To do this, we will ensure that:

- the link between purposes, context and nature of Personal Data is suitable for further Processing;
- the further Processing would not harm your interests and
- there would be appropriate safeguard for Processing.
- We will inform you of any further Processing and purposes.

## **7.0 How we secure your data**

We do our best to keep your Personal Data safe. We use safe protocols for communication and transferring data (such as HTTPS). We use anonymising and pseudonymising where suitable. We monitor our systems for possible vulnerabilities and attacks. We have a Information Security Officer (ISO) who regularly reviews our security to ensure we meet best practice requirements.

Even though we try our best we cannot guarantee the security of information. However, we promise to notify suitable authorities of data breaches. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur.

If you have an account with us, note that you have to keep your username and password secret.

## **8.0 Data Retention**

We will regularly review personal data held by Odin, if the personal data is no longer required, we dispose of it.

## **9.0 Children**

We do not intend to collect or knowingly collect information from children. We do not target children with our services.

## **10.0 Cookies and other technologies we use**

We use cookies and/or similar technologies to analyse customer behaviour, administer the website, track users' movements, and to collect information about users. This is done in order to personalise and enhance your experience with us.

A cookie is a tiny text file stored on your computer. Cookies store information that is used to help make sites work. Only we can access the cookies created by our website. You can control your cookies at the browser level. Choosing to disable cookies may hinder your use of certain functions.

We use cookies for the following purposes:

- Necessary cookies – these cookies are required for you to be able to use some important features on our website, such as logging in. These cookies don't collect any personal information.
- Functionality cookies – these cookies provide functionality that makes using our service more convenient and makes providing more personalised features possible. For example, they might remember your name and e-mail in comment forms, so you don't have to re-enter this information next time when commenting.
- Analytics cookies – these cookies are used to track the use and performance of our website and services
- Social Media cookies – We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Facebook, Twitter and LinkedIn, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

You can remove cookies stored in your computer via your browser settings. Alternatively, you can control some 3rd party cookies by using a privacy enhancement platform such as [optout.aboutads.info](http://optout.aboutads.info) or [youronlinechoices.com](http://youronlinechoices.com). For more information about cookies, visit [allaboutcookies.org](http://allaboutcookies.org).

We use Hubspot to measure traffic on our website. Hubspot have their own privacy policy that can be read [here](#).

## **11.0 Contact Information**

[dataprotection@odin-vision.com](mailto:dataprotection@odin-vision.com)

[info@odin-vision.com](mailto:info@odin-vision.com)

## **12.0 Changes to Privacy Policy**

Odin Vision reserves the right to make changes to this privacy policy.

## **13.0 Review History**

<b>Review History</b>				
<b>Version No:</b>	<b>Date of change:</b>	<b>Changes made Y/N:</b>	<b>If Y – provide details of changes made (including DCN number):</b>	<b>Changed by:</b>
1	-	N	First issue of new process.	-
			Reference the Document control notice (DCN) for future review history	