

Hermes Healthcare Limited Privacy Policy

Overview – the key information you should be aware of

- A. **Who we are:** We are Hermes Healthcare Limited, the owner and provider of a healthcare platform and apps which facilitate the collection and integration of patient data from medical databases and patient devices, which may be accessed by healthcare professionals and organisations. Our company number is 10775217 and our registered office is 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, England. Hermes Healthcare Greece is a subsidiary of Hermes Healthcare Limited with a registered office at 17, Komnion Street, Thessaloniki, 54624, Greece. Hermes Healthcare Limited & Hermes Healthcare Greece are the controller of your personal information and are responsible for your personal information. All references in this policy to "Company", "our", "us" or "we" refer to Hermes Healthcare Limited, or our subsidiaries and group companies, as appropriate. All references in this policy to "our website", refer to the website owned by us at www.hermes.health.
- B. **Our values and what this policy is for:** We value your privacy and want to be *accountable* and *fair* to you as well as *transparent* with you in the way that we collect and use your personal information.

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy, please let us know using our contact details in [section 13](#).

C. **Who this policy applies to:** This policy applies to:

1. [Visitors](https://hermes.health) to our website <https://hermes.health>;
2. Customers, and employees of [customers](#)
3. [Users](#) and potential users of the Hermes Healthcare Limited apps and platform
4. [Prospective customers](#) (to whom we send marketing communications);
5. [Job candidates](#) who wish to join the Hermes Healthcare team;
6. People who contact us with [enquiries](#); and
7. [Our suppliers](#), and employees of our suppliers.

Depending on our relationship, we will collect and use your information in different ways.

What this policy contains: This privacy policy describes the following important topics relating to your information (you can click on the links to find out more):

1. How we obtain your personal information;
2. Collection of your personal information and how we use it;
3. Our legal basis for using your personal information;
4. How and why we share your personal information with others;
5. How long we store your personal information;
6. Your rights;
7. Children;
8. Marketing;
9. Where we may transfer your personal information;
10. Risks and how we keep your personal information secure;

11. Links to other websites;
12. Changes to this privacy policy; and
13. Further questions and how to make a complaint.

E. **Your rights to object:** You have various rights in respect of our use of your personal information as set out in [section 6](#). Two of the fundamental rights to be aware of are that:

1. you may ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
2. you may ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest. You can find out more information in [section 6](#).

F. **What you need to do and your confirmation to us:** Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

The detail - the key information you should be aware of

1. How we obtain your personal information

1.1 You may provide us with your personal information voluntarily. We may also receive information about you from third parties such marketing agencies, market research companies, our suppliers, contractors and consultants, group companies, public websites and public agencies, which we refer to as "third party sources" or "suppliers" throughout this policy.

1.2 You may give us personal information about yourself by using the online forms provided on our website, setting up an account with us, using bulletin boards or forums on our website, or by contacting us by phone, email or other means. This includes, for example, where you provide your personal information to us in order to receive products, deliveries, information or services from us. If you are a supplier, you may also give us personal information about you when you are offering or providing services to us.

2. Collection of your personal information and how we use it

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

2.1 Visitors to our website

- a. What personal information we collect about you - we, or third parties on our behalf, may collect and use any of the following information about you:
 - i. your name including your title;
 - ii. your email address;
 - iii. your telephone number;
 - iv. your employer;
 - v. your job title;
 - vi. your employer's address;
 - vii. your date of birth;
 - viii. information provided when you correspond with us;
 - ix. if you are a Hermes Healthcare apps and/or platform user, the information listed below at [section 2.3](#);
 - x. any updates to information provided to us;

- xi. the following information created and recorded automatically when you visit our website:
 - A. **Technical information.** This includes: the Internet Protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our webpages; and
 - B. **Information about your visit and your behaviour on our website** (for example, the pages that you click on). This may include the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads;
- b. How we use your personal information - we will collect, use and store the personal information listed above for the following reasons:
 - i. to allow you to access and use our website;
 - ii. to allow you to provide information on projects on which you are working and on which you would like to inquire;
 - iii. to register to receive sales or other notifications and materials;
 - iv. to receive enquiries from you through the website about our website, app and associated services;
 - v. for improvement and maintenance of our website and to provide technical support for our website;
 - vi. to ensure the security of our website;
 - vii. to recognise you when you return to our website, to store information about your preferences, and to allow us to customise the website according to your individual interests; and
 - viii. to evaluate your visit to the website and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.

2.2 Customers, and employees of customers

- a. What personal information we collect about you - we, or third parties on our behalf, may collect and use any of the following information about you:
 - i. your name;
 - ii. your email address;
 - iii. your telephone number;
 - iv. the name of your company;
 - v. your job title;
 - vi. your date of birth;
 - vii. username and password for access to the Hermes Healthcare apps and/or platform ;
 - viii. information provided when you correspond with us;
 - ix. any updates to information provided to us;

- x. if you are a Hermes Healthcare apps and/ or platform user, the relevant information is listed below, at section 2.3
 - xi. information about the provision of existing or potential projects or studies using or developing new elements of the Hermes Healthcare apps and platform and the associated services we provide (or may provide) to you including (but not limited to):
 - A. information needed to provide the services to you, or develop future services (including information on joining forms, order details, order history and payment details);
 - B. customer/patient/clinician services information; and
 - C. customer/patient/clinician relationship management and marketing information;
 - xii. information you provide to help us provide you with improved service, for example if we ask you to fill in a survey or questionnaire.
- b. How we use your personal information - we will collect, use and store the personal information listed above for the following reasons:
- i. to provide you with our interfaces, which help you manage our services;
 - ii. to facilitate deliveries of data, new products and services to you;
 - iii. to deal with any enquiries or issues you have about the Hermes Healthcare apps, and/or platform and associated services that you request from us, our app which helps you manage our services, and about our products and services;
 - iv. to send you certain communications (including by email or post) about our products and services such as administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our fees and charges);
 - v. to carry out statistical analysis, product research and feedback and market research on people who may be interested in our existing or new Hermes Healthcare products and services; and
 - vi. if it is in our legitimate interests for business development and marketing purposes, to contact you (including by telephone or post) with information about our products and services or the products and services of our suppliers which either you request, or which we feel will be of interest to you; and
 - vii. if you are a sole trader or a non-limited liability partnership and if you have consented, to contact you by email with information about our products and services or the products and services of our suppliers which either you request, or which we feel will be of interest to you.

Please see sections [2.8](#) and [2.9](#) for more details about how we use your personal information.

- c. Source of personal information. We may receive some of your personal information from third parties, such as from other customers or clinicians where you use the Hermes Healthcare apps, or/and platform or other related interface.
- d. Special categories of data. Some of the personal information that we collect about you or which you provide to us about you or your family members may be special categories of data. Special categories of data include information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data.
- e. Information we need to provide services to you. We need certain types of personal information so that we can provide services to you and perform contractual and other legal obligations that we have to you. If you do not provide us with such personal information, or if you ask us to delete it, you may no longer be able to access Hermes Healthcare apps and/or platform for receipt of the Hermes Healthcare services.

2.3 Users of the Hermes Healthcare apps and platform

What personal information we collect about you - when registering for or using the Hermes Healthcare app and platform (myAlgos & myAthlos) we may collect and use the following information about you (and we may use any of the following information in the ways explained below):

- i. your name;
 - ii. your postal address;
 - iii. your email address;
 - iv. your telephone number;
 - v. your age;
 - vi. your sex;
 - vii. your height, weight and other physical characteristics;
 - viii. your ethnic origin;
 - ix. information about your mental and physical health and wellbeing;
 - x. your medical records and other documentation related to your medical history;
 - xi. the name, address, telephone number and email address of any doctor, care provider or healthcare professional and their associated healthcare organisation;
 - xii. your genetics;
 - xiii. username and password for access to the Hermes Healthcare apps and/or platform;
 - xiv. information about the Hermes Healthcare services we provide to you;
 - xv. details of your leisure activities and interests;
 - xvi. information about your preferences;
 - xvii. location data sent from the Hermes Healthcare apps and/or platform.
- a. How we use your personal information - We will collect, use and store the personal information listed above for the following reasons:
- i. to provide the Hermes Healthcare apps and platform to you;
 - ii. to help you manage your profile, preferences and other choices in relation to the Hermes Healthcare apps and platform and associated services;
 - iii. to contact your named clinician or healthcare professional to obtain access to and upload your medical records and other documentation relating to your medical history to the Hermes Healthcare apps and platform;
 - iv. to track your activity levels;
 - v. record and collate your symptoms, mood, change in any physical or mental characteristics;
 - vi. to enable named clinicians or healthcare professional to access your medical records and other logged information via the Hermes Healthcare apps and/or platform in order to provide you with care or treatment or any other recommended course of action;
 - vii. suggest appropriate projects or initiatives operated or developed by Hermes Healthcare or third parties;
 - viii. for the purpose of anonymising certain categories of that personal information, aggregating that anonymised data with the anonymised data of other users of the Hermes Healthcare apps and/or platform and the provision of that data to third

parties in order for those third parties to collect, use and store that data for research into medical conditions, trends and the development, adherence and efficacy of treatments.

Please see sections [2.8](#) and [2.9](#) for more details about how we use your personal information.

- b. Source of personal information. We receive your personal information from you and from your named clinician, healthcare professional or healthcare organisation which collects and stores your medical records and associated information.
- c. Location data. Certain services will make use of location data sent from any mobile telephone or handheld devices that are controlled, but not owned, by you ("Device"). You can turn off this functionality at any time by turning off the location services settings for the Hermes Healthcare apps on the Device. If you use these location services, you consent to us and our affiliates' and licensees' transmission, collection, maintenance, processing and use of your location data and queries to provide and improve location-based products and services. You may withdraw this consent at any time by turning off the location services settings on the relevant Device.

2.4 Prospective customers to whom we send marketing communications

- a. What personal information we collect about you - we, or third parties on our behalf, may collect and use any of the following information about you:
 - i. your name including your title;
 - ii. your postal address;
 - iii. your email address;
 - iv. your telephone number;
 - v. information about your preferences.
- b. How we use your personal information

We will collect, use and store the personal information listed above, if you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by telephone, email or post) with information about our products and services which either you request, or which we feel will be of interest to you (including newsletters).

Please see sections [2.8](#) and [2.9](#) for more details about how we use your personal information.

- c. Source of personal information. We may receive some of your personal information from third parties, such as marketing agencies.

2.5 Job candidates who wish to join the Hermes Healthcare team

- a. What personal information we collect about you - we, or third parties on our behalf, may collect and use any of the following information about you:
 - i. your name including your title;
 - ii. your postal address;
 - iii. your email address;
 - iv. your telephone number;
 - v. CVs and information about your employment history
 - vi. contact details of referees.

Depending on the nature of the role and the applicable jurisdiction, from time to time, we may also collect sensitive personal information about you, such as information about your health, background check information, including criminal history, and whether you are a member of any professional or trade associations.

b. How we use your personal information

We will collect, use and store the personal information listed above, if you have consented or, otherwise, if it is in our legitimate interests, to assess your suitability for any vacant roles, to contact you (including by telephone, email or post) with information about our company, products and services, recruitment process and progress of your application which either you request, or which we feel will be of interest to you.

Please see sections 2.8 and 2.9 for more details about how we use your personal information.

- c. Source of personal information. We may receive some of your personal information from third parties, such as recruitment agencies or through referrals.
- d. Special categories of data. Some of the personal information that we collect about you or which you provide to us about you may be special categories of data. Special categories of data include information about physical and mental health, background check information, including criminal history and trade union membership.

2.6 People who contact us with enquiries

- a. What personal information we collect about you - we, or third parties on our behalf, may collect and use any of the following information about you:

- i. your name including your title;
- ii. your postal address;
- iii. your email address;
- iv. your telephone number;
- v. information provided when you correspond with us;
- vi. any updates to information provided to us.

b. How we use your personal information

We will collect, use and store the personal information listed above to deal with any enquiries or issues you have about our products and services, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes. Please see sections 2.8 and 2.9 for more details about how we use your personal information.

2.7 Our suppliers, and employees of our suppliers

- a. What personal information we collect about you - we, or third parties on our behalf, may collect and use any of the following information about you:

- i. your name including your title;
- ii. work contact information (phone number, postal address, mailing address, email address);
- iii. your job title;
- iv. information provided when you correspond with us;
- v. any updates to information provided to us;
- vi. personal information we collect about you from third party sources such as LinkedIn;
- vii. CVs, pitch and tender information;
- viii. proof of identification and address;
- ix. visa or work permit documentation;
- x. details of compensation, expense claims and bank details;

- xi. information required to access company systems and applications (such as system ID).
- b. How we use your personal information - we will collect, use and store the personal information listed above for the following reasons:
 - i. to enable us to purchase and receive products and services from you (including supplier due diligence, payment and expense reporting and financial audits);
 - ii. to deal with enquiries from you;
 - iii. to confirm information on CVs and performance reference checks, to assess you or your employer's suitability to work for us;
 - iv. for equal opportunities monitoring;
 - v. for health and safety records and management; and
 - vi. for security vetting and criminal records checks (where applicable and allowed by law). Please see sections [2.8](#) and [2.9](#) for more details about how we use your personal information.
- c. Source of personal information. We may receive some of your personal information from third party sources, such as your employer or your employer's company website. We may also collect this personal information from publicly available sources, such as LinkedIn.
- d. Special categories of data. Some of the personal information that we collect about you or which you provide to us about you, or your employees may be special categories of data. Special categories of data include information about your physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data.
- e. Information we need to provide services to you. Please note that we need certain types of personal information so that you or your employer can provide services to us. If you do not provide us with such personal information, or if you or your employer ask us to delete it, you may no longer be able to provide services to us.

2.8 Universal uses for your personal information

Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

- a. to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- b. for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
- c. to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
- d. to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

2.9 Further processing

Before using your personal information for any purposes which fall outside those set out in this section 2, we will undertake an analysis to establish if our new use of your personal information is compatible with the purposes set out in this section 2. Please contact us using the details in [section 13](#) if you want further information on the analysis we will undertake.

3. Legal basis for use of your personal information

3.1 The legal bases for using your personal information as set out in this privacy policy are as follows:

- a. our use of your personal information is necessary to perform our obligations under any contract with you (for example, to comply with the terms of use of our app, platform or website which you accept by registering for app and platform or browsing our website); or
- b. our use of your personal information is necessary for complying with our legal obligations (for example, for health and safety purposes); or
- c. where neither (a) nor (b) apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are to:
 - i. run, grow and develop our business (as well as the businesses of our group companies);
 - ii. operate and improve our website and the Hermes Healthcare apps and platform;
 - iii. select appropriately skilled and qualified suppliers;
 - iv. ensure a safe environment for our residents and suppliers;
 - v. carry out marketing, market research and business development;
 - vi. place, track and ensure fulfilment of orders with our suppliers; and
 - vii. for internal group administrative purposes.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details in [section 13](#).

3.2 We may use your special categories of data (such as health and wellbeing information) where you have provided your consent (which you may withdraw at any time after giving it, as described below). This includes all data you or your named clinician, healthcare professional or healthcare organisation provide to us in order to use it within the Hermes Healthcare apps and platform.

3.3 We may process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below).

3.4 If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at privacy@hermes.health and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide the Hermes Healthcare apps and platform and associated services to you (for example, if those services require use of your special categories of data such as health information).

4. How and why we share your personal information with others

4.1 We may share your personal information with our group companies where it is in our legitimate interests to do so for internal administrative purposes (for example, for corporate strategy, compliance, auditing and monitoring, research and development, machine learning and quality assurance).

4.2 We will share your personal information with the following third parties or categories of third parties and data processors:

- a. Microsoft Azure Cloud Services, who provides you with the Hermes Healthcare app and platform on our behalf and host our website.
- b. we may share anonymised and aggregated statistical information with our suppliers to demonstrate what interest there has been in any marketing campaigns we have assisted our suppliers in carrying out;

- c. we may also share anonymised data collected through the Hermes Healthcare app and platform, aggregated with the anonymised data of other users of the Hermes Healthcare app or platform, with third parties such as life sciences companies, health care organisations and insurance companies, in order for those third parties to collect, use and store that data for research into medical conditions, trends and the development, adherence and efficacy of treatments;
- d. our other service providers and sub-contractors, including payment processors, utility providers, suppliers of technical and support services, insurers, logistic providers, and cloud service providers;
- e. public agencies and the emergency services;
- f. companies that assist in our marketing, advertising and promotional activities, such as marketing automation platforms;
- g. analytics and search engine providers that assist us in the improvement and optimisation of our website.

4.3 We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

4.4 We will also disclose your personal information to third parties:

- a. where it is in our legitimate interests to do so to run, grow and develop our business:
 - i. if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
 - ii. if substantially all of our or any of our affiliates' assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
- b. if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- c. in order to enforce or apply our terms of use, our terms and conditions for customers or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- d. to protect the rights, property, or safety of Hermes Healthcare, our staff, our customers or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

4.5 We may also disclose and use anonymised, aggregated reporting and statistics about users of our app, platform, website or associated services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

4.6 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

5. How long we store your personal information

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time for which we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

6. Your rights

6.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at hermes@hermes.health at any time. You have the following rights:

- a. Right of access. You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation as to whether your personal information is being used by us; details about how and why it is being used; and details of the safeguards which are in place if we transfer your information outside of the European Economic Area ("EEA").
- b. Right to update your information. You have a right to request an update to any of your personal information which is out of date or incorrect.
- c. Right to delete your information. You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in [section 13](#). We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are, using the contact details in [section 13](#).
- d. Right to restrict use of your information: You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in [section 13](#). We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contact details in [section 13](#).
- e. Right to stop marketing: You have a right to ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- f. Right to data portability: You have a right to ask us to provide your personal information to a third party provider of services. This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.
- g. **Right to object. You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.**

6.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period under applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

6.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

7. Children

7.1 You must be aged 18 or over to purchase products or services from us. Our website and services are not directed at children and we do not knowingly collect any personal information from children without express consent from a parent or guardian.

7.2 If you are a child and we learn that we have inadvertently obtained personal information from you from our websites, or from any other source, then we will delete that information as soon as possible.

7.3 Please contact us at hermes@hermes.health if you are aware that we may have inadvertently collected personal information from a child.

8. Marketing

8.1 We may collect and use your personal information for undertaking marketing by email telephone and post.

8.2 We may send you certain marketing communications (including electronic marketing communications) if it is in our legitimate interests to do so for marketing and business development purposes or, if you are a sole trader or a non-limited liability partnership if you have consented to receive such electronic marketing information.

8.3 However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

8.4 If you wish to stop receiving marketing communications, you can contact us by email at hermes@hermes.health

9. Where we may transfer your personal information

9.1 Your personal information may be used, stored and/or accessed by staff operating outside the EEA working for us, other members of our group or suppliers. Further details on to whom your personal information may be disclosed are set out in [section 4](#).

9.2 If we provide any personal information about you to any such non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy policy. These measures may include the following permitted in Articles 45 and 46 of the General Data Protection Regulation:

- a. in the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or
- b. in the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

9.3 Further details on the steps we take to protect your personal information, in these cases is available from us on request by contacting us by email at hermes@hermes.health at any time.

10. Risks and how we keep your personal information secure

10.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public, information that you would prefer to keep private.

10.2 For this reason, Hermes Healthcare is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures.

10.3 In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and apps and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorized access to it.

10.4 Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

11. Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personal information that we collect or which we receive from third-party sources, and we cannot be responsible for personal information about you that is collected and stored by third- parties. Third-party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or

otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or policies.

12. Changes to our privacy policy

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy.

13. Further questions and how to make a complaint

13.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact hermes@hermes.health. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

13.2 In accordance with Article 77 of the General Data Protection Regulation, you may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current as of 20 May 2020.