

1. Who is responsible for managing my information?
2. What information do we collect?
3. How do we use your information?
4. On what legal basis will we process your information?
5. Who will you share my information with?
6. How do you manage and protect my information?
7. How long will we hold your information for?
8. Your rights
9. Does the notice apply to linked websites?
10. How do we update this privacy notice?
11. Who can I contact if I have queries about this privacy notice?

### **1. Who is responsible for managing my information?**

Cipher Surgical Ltd. of The Venture Centre, Sir Williams Lyons Road, Coventry, CV4 7EZ, United Kingdom ("Cipher Surgical", "we" or "us").

This is our Privacy Notice and it explains how we collect, use, share and protect your personal information and tells you about your rights in relation to your personal information and how the law protects you.

This Privacy Notice applies in the following circumstances:

- When you visit our website and online services
- When you request information from us or provide information to us (by any means)
- When you or the organisation you work for provide services or products to us
- When we are given your information by contacts in our corporate network
- When you are entered onto our marketing mailing list

There is a separate Privacy Notice for employees and contractors.

We are responsible for the collection and proper management of any personal information you give to us. We will keep your personal details secure and use the information you provide consistently with applicable privacy and data protection laws and the terms of this Privacy Notice.

### **2. What information do we collect?**

Personal data, or personal information, means any information about you from which you can be identified. It does not include anonymous data.

We may collect personal information including your name, contact details, organisation, employment, positions held, billing and financial information (such as billing address, bank account and payment information) and enquiry/complaint details. We may also collect

personal information about your dealings with us, including any contact we have with you in person, by telephone, email or online.

Like many other websites, our website uses servers that collect information from you (or the device you use to access it) automatically. This includes IP address, browser type and versions, how you use our website, the page that directed you to our site, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technology on the device you use to access it.

We collect some of your personal information through the use of cookies. For further information about cookies and how we use them please read our [cookie policy].

### **3. How do we use your information?**

We use your information to:

- Respond to requests, enquiries, or complaints received from you
- Facilitate our business operations
- Maintain and develop our relationship with you
- Administer and protect our business
- Comply with our legal and regulatory obligations and requests
- Send you details about our products and services
- Protect, establish, exercise, or defend legal rights

A server log stores some of the personal information we collect automatically and we analyse it to administer and protect our business and our website including: determining security threats to our website, troubleshooting errors, monitoring the effect of changes, assessing usage of the features of our website and generally ensure our website works well for you. We also analyse this data to improve who our website reaches and to make operations more effective.

We will only retain your personal information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory, internal policy or other business requirements.

### **4. On what legal basis will we process your information?**

We will always process your personal information on lawful grounds and in particular on the grounds set out below:

#### ***Contractual or Legitimate Interest***

We will use your personal information if doing so is necessary to fulfil any contract or for our legitimate interests and your rights as an individual do not override those legitimate interests.

For example, we have a legitimate interest in using information we collect from you automatically (see section 3 above) to run our website and business effectively.

If you have emailed us with a query it may be in our legitimate interests to share your details with other companies in our group so that we can respond.

If you have placed an order, we will use your personal information to process and fulfil the order.

In the event that we buy or sell any business and/or assets we may disclose your personal information to the prospective buyer or seller of the business and/or assets.

The above activities are conducted on the basis that they are in the legitimate interest of Cipher Surgical.

***Legal Obligation***

We may also use and disclose your personal information for compliance purposes, to the extent that we are required to do so by law or regulation, by a law enforcement or taxation agency or for the purposes of preventing crime.

**5. Who will you share my information with?**

We share your personal information with the parties set out below for the purposes described in section 3.

For the reasons set out in section 3 and/or because it is in our legitimate interests to do so, we may share your personal information with other companies within our group and third parties who provide services to us.

We may also use and disclose your personal information as required for the purposes of compliance, including to any legal or taxation authority or a relevant third party in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend our legal rights.

**6. How do you manage and protect my information?**

The security of your personal information is important to us and we have put in place appropriate security measures to prevent it from being lost, used, accessed, altered, or disclosed in an unauthorised way. Further, we limit access to your personal data to employees and contractors/ third parties who have a business need to know. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

**7. How long will we hold your information for?**

We only store your personal information for as long as it is required for the purpose we collected it for or to meet legal or related requirements. Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner. To determine the appropriate retention period for your personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from its unauthorised use or disclosure, the purposes for which we process your personal data and whether we can achieve those purposes by other means.

### **8. Your rights**

You have the right to ask us at any time:

- to confirm whether we hold any of your personal information;
- to send you a copy of any personal information that we hold about you;
- to correct any inaccuracies in your personal data and to add relevant details where the personal data we hold is incomplete;
- to delete (to the extent possible) any of your personal data, where we are required by law to do so;
- to stop or restrict processing your personal data, where we are required by law to do so; and
- to stop processing any of your personal data that we process on the basis of our legitimate interests.

We do not use your personal data for the purpose of profiling.

You can read more about your rights in relation to your personal information by visiting the Information Commissioner's website. If you wish to exercise any of these rights or wish to object to our use of your personal information, please write to us at the address given below in section 13.

### **9. Does the notice apply to linked websites?**

Our websites may contain links to other websites. This privacy notice only applies to Cipher Surgical's website and so when you link to other websites you should read their own privacy policies.

### **10. How do we update this privacy notice?**

We keep our privacy notice under regular review, and we will place any updates on our website.

### **11. Who can I contact if I have queries about this privacy notice?**

You can also contact us directly if you have any questions about our privacy notice or the personal information we hold about you.

Please contact us by email to: [info@ciphersurgical.com](mailto:info@ciphersurgical.com)

---

Doc Number:  
CO-IN-ID-9

## Privacy Policy



Approval Date:  
28 May 2020

---

Or call on: +44 (0) 2477 170 700

If you are dissatisfied with our handling of any complaint you also have the right to raise concerns with The UK Information Commissioner: <https://ico.org.uk>