

## PRIVACY POLICY

VERSION 1.0

### 1. INTRODUCTION AND TERMS

SRA Developments Limited (trading as BOWA Medical UK) (“We” or “us”) are committed to protecting and respecting your personal data and privacy.

This privacy policy relates to how we use and collect personal data from you through your use of this website, our mobile application or when you purchase a product or service from us. It also relates to our use of any personal information you provide to us by telephone, in written correspondence (including letter and email), by SMS and in person. Please note that this website, our mobile application and our services are not intended for children under the age of 18 and we do not knowingly collect data relating to children.

Whenever you provide personal data, we are legally obliged to use your information in line with all applicable laws concerning the protection of such information; including the Data Protection Act 1998 and 2018 (DPA), and The General Data Protection Regulation 2016 (GDPR) together, and with other subsequent laws “**Data Protection Laws**”.

This privacy policy also forms part of our terms of business and is not intended to override them. This policy may be amended or updated from time to time and any revisions will be posted to this page.

### 2. WHO WE ARE AND HOW TO CONTACT US

- 2.1 For the purpose of the Data Protection Laws, the data controller is SRA Developments Limited, registered company number 01385171. If you want to request more information about our privacy policy or information regarding data protection you should contact us using the details provided below:

FAO: Privacy Officer  
SRA Developments Limited  
Bremridge House  
Bremridge  
Ashburton  
Devon  
TQ13 7JX

Email: [hjdionisius@arcor.de]

Telephone: [+49 (0) 707 260 020] and ask to speak to the Privacy Officer.

### 3. THE DATA WE COLLECT ABOUT YOU

- 3.1 We collect and process personal data. Typically the personal data we collect and process will include identity, contract, financial, transactional, technical, profile, usage and marketing and communications data such as:

3.1.1 **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and images.

- 3.1.2 **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- 3.1.3 **Financial Data** includes bank account and payment card details.
- 3.1.4 **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- 3.1.5 **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- 3.1.6 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- 3.1.7 **Usage Data** includes information about how you use our website, products and services.
- 3.1.8 **Marketing and Communications** data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Please note that we may collect and/or process other personal data from time to time.

- 3.2 We also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data, but is not considered to be personal data in law as it will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate a percentage of users accessing a specific feature of our services. However, if we combine or connect your aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used solely in accordance with this policy.
- 3.3 We do not collect the following special categories of personal data about you: details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.
- 3.4 We only collect data from you directly or via third parties (see the section *Third Parties* below).

#### 4. **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

#### 5. **HOW YOUR DATA WILL BE USED**

- 5.1 We use information held about you to:
  - 5.1.1 carry out our obligations arising from any contracts entered into between you and us and provide our services;
  - 5.1.2 carry out feedback and research on our services; and
  - 5.1.3 notify you about changes to our services.

- 5.2 We never sell your data to third parties or allow third parties to contact you without your permission.
- 5.3 We share your data with third parties where there is a legal obligation for us to do so or we have identified a valid lawful basis as set out in the table below (please also see clause 7 below, lawful basis). We may process your personal data without your knowledge or consent where this is required or permitted by law.
- 5.4 You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.
- 5.5 We have set out below in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user and customer	Identity Contact	Performance of a contract with you
To process and deliver your order including: Manage payments, fees and charges Collect and recover money owed to us	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy Asking you to leave a review or take a survey	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	Identity Contact Profile Usage	Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

	Marketing and Communications	
To administer and protect our business, this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and our mobile application.	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  Necessary to comply with a legal obligation
To deliver relevant website and mobile application content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Contact Profile Usage Marketing and Communications Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, mobile application, products/services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical Usage Profile Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

## 6. LAWFUL BASIS FOR PROCESSING

6.1 We only process your data (which may include providing it to a third party) where we have identified a valid lawful basis to do so. These are as follows:

6.1.1 **Contractual obligation** – Where processing is necessary to comply with our obligations arising out of a contract, for example, where you have bought products from us we will

use the personal data you provide to fulfil our contractual obligations e.g. taking payment /shipping.

- 6.1.2 **Legitimate Interest** - Where we use legitimate interests we will record our decision on making this decision. We rely on legitimate interest where processing of the data we hold on you does not, in our opinion, affect your rights or freedoms and is proportionate to our interests e.g. keeping you up to date with our latest products or obtaining your feedback on our service.
- 6.1.3 **Consent** – We will seek to obtain your consent to process your data outside our contractual obligations (see above) unless we have identified a Legitimate Interest (see above).

**7. THIRD PARTIES AND SHARING INFORMATION**

7.1 We will keep your information within the organisation except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

7.2 Please see below the list which sets out the categories of recipients of personal data.

<i>SERVICE PROVIDERS WHO MAY RECEIVE YOUR PERSONAL DATA</i>
<i>IT Support Services</i>
<i>Email Provider</i>
<i>Secure document disposal service</i>
<i>Banks</i>
<i>Online payment providers</i>
<i>Office cleaning services</i>
<i>Accountants</i>
<i>Solicitors</i>
<i>Feedback aggregators and collectors</i>

7.3 In addition third parties may provide us with personal data and they should only do so where the law allows them to.

**8. WHERE YOUR DATA IS HELD**

Your data is stored by us and our processors in the UK, EEA or in a country where an adequacy decision has been made by the European Data Protection Board (EDPB) (e.g. EU-US Privacy Shield).

**9. APPLICATIONS TO WORK FOR US**

If you apply to work for us (directly or indirectly) in any role we may receive data about you from third parties. In addition, we will keep the details of your application and any additional information

provided to us by you or others during your application so that we can keep you informed of future opportunities that you may be interested in. If you do not wish for us to keep your details for this reason, please let us know by contacting us using the details provided in this policy.

## 10. DATA RETENTION

Our data retention policy is dictated by the Data Protection Laws and is available for inspection by submitting a written request using the contact details provided in this policy.

## 11. YOUR RIGHTS

11.1 Under the Data Protection Laws your rights are:

11.1.1 **To be informed** – We must make this privacy policy (sometimes referred to as a privacy notice) available with the emphasis on transparency over how we process your data.

11.1.2 **Access** – You are entitled to find out what details we may hold about you and why. We strive to be as open as we can be in terms of giving people access to their personal data. Individuals can find out if we hold any of their Personal Data by making a formal request under the Data Protection Laws. Such requests should be in writing to the contact details provided in this policy. If we do not hold information about you we will confirm this in writing at the earliest opportunity. If we do hold your personal data we will respond in writing within one calendar month of your request (where that request was submitted in accordance with this policy). The information we supply will:

- (a) confirm that your data is being processed;
- (b) verify the lawfulness and the purpose of the processing;
- (c) confirm the categories of personal data being processed;
- (d) confirm the type of recipient to whom the personal data have been or will be disclosed; and
- (e) let you have a copy of the data in format we deem suitable or as reasonably required by you.

11.1.3 **Rectification** – We are obliged to correct or update your details. We will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

11.1.4 **Erasure** – This is also known as the request to be forgotten. Under Data Protection Laws you have the right to erasure under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and should be submitted in writing to the contact details provided in this policy.

11.1.5 **Restrict processing** – You have the right to ‘block’ or suppress the processing by us of your personal data.

11.1.6 **Portability** – You have the right to obtain and reuse your personal data that you have provided to us.

11.1.7 **Object** – You have the right to object to us processing your data in relation to direct marketing and or profiling.

11.1.8 **Rights in relation to automated decision making and profiling** – We do not use automatic decision making or profiling.

11.2 Please note that you may need to provide identification in order to prove who you are if you wish to invoke any of your rights as provided by the Data Protection Laws and as summarised above.

11.3 If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

## 12. **CHANGES**

We keep our privacy policy under regular review and you should check back regularly to ensure you are aware of changes to it. We may display this notice to you from time to time to help ensure you are aware of its contents.

## 13. **COMPLAINTS**

You have the right to complain about the processing of your personal data. Please contact us using the details provided above. If you are still unsatisfied you have the right to complain to the [Information Commissioners Office](#).