

# PRIVACY POLICY

Active X Clinics Ltd (“We”) are committed to protecting and respecting your privacy.

This policy (together with our Terms of Use and Terms of Supply above and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (“the Act”) and the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”), the data controller is Active X Clinics Ltd (SC246156) whose registered office at 21b Coates Crescent, Edinburgh, EH3 7AF. Our Data Protection Administrator is Gavin Routledge and can be contacted by email [info@backpainandsciatica.com](mailto:info@backpainandsciatica.com) or by post at the above address.

Information we may collect from you

We may collect and process the following data about you:

- Information that you provide by filling in forms, or responding to questions on our site [www.backpainandsciatica.com](http://www.backpainandsciatica.com) or any of its subdomains e.g. [golf.backpainandsciatica.com](http://golf.backpainandsciatica.com) . This includes information provided at the time of registering to use our site, subscribing to our service, or requesting further services, and in interactions with the site. We may also ask you for information when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Information we receive from other third party sources about you, e.g. business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit references agencies and we will notify you when we receive information about you from them and the purposes for which we intend to use that information.
- The information you give us may include your name, address, email address, phone or mobile number, age, username, password and other registration information, financial and credit card information, personal description and photographs.

- **Details of your visits to our site including, but not limited to:**
  - **Technical information, including the type of mobile device you use, your mobile operating system, and the type of mobile browser you use;**
  - **Information stored on your mobile or other device, including contact information, login information, photos, videos or other digital content; and**
  - **traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.**

Some of the data which we may collect and process about you will relate to your health, which we refer to as sensitive personal information and is required in order that we can deliver our service to you.

#### **IP addresses**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

#### **Cookies**

Our website uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily. You can find more information about the purposes for which we use cookies in the table below:

#### **Purpose**

Cookies may be used to enable us to]:

- Estimate our audience size and usage pattern.
- Store information about your preferences, and so allow us to customise our site and to provide you with offers that are targeted at your individual interests.
- Speed up your searches.
- Recognise you when you return to our site.

Allow you to use our site in a way that makes your browsing experience more convenient.

If you complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.

Please note that third parties (including, for example, advertising networks such as Adroll and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or advertising targeting cookies.

When you come to our site Adroll will install cookies on your computer/device's browser for advertising purposes.

Other third parties such as Google or Facebook may use pixel tracking to understand your behaviour on our site.

Except for essential cookies, all cookies will expire after 5 years. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

#### Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the

processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### Uses made of the information

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer/device.
- For general administration purposes.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any agreements entered into between you and us.
- To notify you about changes to our service.

We may also use your data to provide you with information about goods and services which may be of interest to you and we may contact you about these by email, post or telephone.

If you are an existing client, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new client, by accepting our terms, you are consenting only to being contacted by electronic means.

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with anonymous aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in EH1). We will use the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

### Disclosure of your information

We may disclose your personal information to any member of our group, which means our subsidiaries, our Partners, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Active X Clinics Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use above or Terms of Supply below and other agreements; or to protect the rights, property, or safety of Active X Clinics Ltd, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### Your rights

As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- the right to be informed about our collection and use of personal data;
- the right of access to the personal data we hold about you or your employees;
- the right to rectification if any personal data we hold about you or your employees is inaccurate or incomplete;

- the right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you or your employees or customers (we only hold personal data for a limited time but if you would like us to delete it sooner, please contact us. Please note that deletion of certain personal data may prevent the services we provide for you from functioning);
- the right to restrict (i.e. prevent) the processing of personal data;
- the right to data portability (obtaining a copy of personal data to re-use with another service or organisation);
- the right to object to us using personal data for particular purposes; and
- rights with respect to automated decision making and profiling.

If you have any cause for complaint about our use of personal data, please contact us at [info@active-x.co.uk](mailto:info@active-x.co.uk) and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office details of which can be found here <https://ico.org.uk/>

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

#### Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@backpainandsciatica.com](mailto:info@backpainandsciatica.com)