



## **Privacy Policy and Requests for Information**

This Privacy Policy applies to personally identifiable information collected by OrthoXel through this website (this "Website") or other systems and processes under OrthoXel 's control. Although this Website provides links to third-party websites, such third-party websites are not covered by this Privacy Policy.

OrthoXel assumes no responsibility for the privacy or security of information you provide to any third party through linked websites or any other means.

By using this Website, you agree that you have reviewed and understood our Terms and conditions of Use and this Privacy Policy to your full satisfaction, that you accept and are subject to our Terms and Conditions of Use of OrthoXel DAC Websites and this Privacy Policy, and that OrthoXel is permitted to use your personal information as set forth below.

Our Privacy Policy is applicable and enforced for the OrthoXel website at [www.OrthoXel.com](http://www.OrthoXel.com) and all other websites owned by OrthoXel. It is our intent to comply with The General Data Protection Regulation (GDPR) (EU) 2016/679 and the applicable Irish Law as outlined in the Data Protection Acts 1998 and 2003.

Under the GDPR, we can only hold and process your personal data on one or more of the grounds authorised by the GDPR. In this policy we advise you of the basis on which we will receive and process your personal data and of your rights under the GDPR. This privacy policy sets out how OrthoXel uses and protects any information that you provide OrthoXel, and when you use this website.

OrthoXel is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

OrthoXel may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 25<sup>th</sup> May, 2018 and was updated on 15<sup>th</sup> August 2018.

## **WHAT PERSONAL INFORMATION WE COLLECT (Cookies & Google Analytics)**

We may collect contact information such as name, IP address, physical address, title, department, telephone number, areas of interest and e-mail address. In addition, when you visit our website, we may place a “cookie,” a small computer file, on your computer to help us recognize and serve you better when you return. We keep this information to make it easier for you to utilize our site. You may delete this cookie from your computer without substantially impairing your use of our Website.

OrthoXel also employs Google Analytics to track and manage usage of the website. For full disclosure of how we track data using Cookies and Google Analytics please see our privacy page on [www.orthoxel.com/cookies-and-privacy-policy](http://www.orthoxel.com/cookies-and-privacy-policy)

## **LAWFUL PROCESSING OF DATA**

OrthoXel commits to the lawful processing of data and will apply one of the three following bases when processing personal data:

- a. Consent; an individual has given OrthoXel clear permission to process their data.
- b. Contract; where the individuals data is necessary to process by reason of a contractual agreement.
- c. Legitimate interests; processing of personal data is necessary for legitimate business purposes.

There are two other instances whereby OrthoXel may process personal data and that is vital interests if (in the unlikely case) it becomes necessary to protect the life of the individual or if there is a legal obligation outside of the contract (for example we are requested to share data by an Garda Síochána or other legal body).

## **HOW WE USE YOUR PERSONAL INFORMATION**

OrthoXel uses your personal information to process your requests and transactions, offer or furnish additional products and services, personalize the types of information you receive from OrthoXel, assess trends in the use of this Website, develop content and functionality that helps us serve our customers’ needs, and improve the service and products we provide. OrthoXel will not use your personally identifiable information in a manner different from that stated at the time of collection without first attempting to notify you via the last email address we have in our records.

We may share your personally identifiable information with third parties that assist us in providing our services, carrying out your account needs or providing you with information about their services that we believe may be of interest to you. If we transfer personally identifiable information to a third party that is acting as our agent, the third party will be required to protect the confidentiality of that information. As we continue to develop our

business, we might sell or buy businesses or assets, or OrthoXel might be acquired by another company. In any of those circumstances, personal information in our databases may be included among the transferred assets.

OrthoXel may also use your personal information to prevent harm or injury, to prevent fraud, to protect our legal interests, to comply with or respond to legal process and to comply with applicable laws.

Resumes submitted by job applicants via our website or LinkedIn can be viewed by our human resources department personnel, hiring managers, employees who will be interviewing the candidate and the administrative assistants to these individuals for applicant screening and hiring purposes and for general human resources purposes.

## **CHOICE**

You will have the opportunity to opt in to receiving communications from us when we first request your information. Also, in our e-mail communications you will find instructions for unsubscribing. You can request removal of your personally identifiable information from our databases by contacting us at the address listed below. To honour your request, we will need the exact information you want removed and information sufficient for us to identify the type of communication you received from us. All requests for data deletion will be processed in accordance with GDPR.

## **DATA INTEGRITY**

We will take reasonable steps to see that the personal information in our systems is relevant for its intended use and is accurate, complete and current.

## **ENFORCEMENT**

OrthoXel will conduct periodic reviews of compliance to verify that this Privacy Policy is accurate, comprehensive, prominently displayed, complete, implemented and accessible. Any employee who violates this Privacy Policy may be subject to disciplinary action.

## **SPECIAL RULES APPLICABLE TO DATA COLLECTED OR PROCESSED IN THE EUROPEAN UNION**

### **Definition of “Personal Information” and “Sensitive Personal Information”**

**"Personal Information"** means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity.

**"Sensitive Personal Information"** means personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information pertaining to the sex life of the individual.

## **YOUR RIGHTS**

- The right at any time to withdraw your consent to the processing of your personal data.
- The right to be informed of what personal data of yours we hold, how we obtained it and how long we intend to keep it.
- The right to have your personal data rectified in the event that it is inaccurate or incomplete.
- The right to request the erasure of your personal data (also called the right to be forgotten).
- The right to restrict the processing of your personal data.
- The right to data portability (i.e. transfer of your personal data to another organisation).

Your rights above can be exercised free of charge by contacting OrthoXel on the contact points outlined below.

## **Data Retention**

Data will be retained by OrthoXel for no longer than is necessary in relation to the purposes for which it was originally collected. All personal data will be deleted and destroyed as soon as possible where it has been determined that there is no longer a need to collect it.

Data will be reviewed and cleansed on an annual basis by OrthoXel.

## **Internal and External Procedures for Inquiries and Resolving Complaints**

In compliance with GDPR, OrthoXel commits to resolve complaints about your privacy and our collection or use of your personal information within a one-month period. EU individuals with inquiries or complaints regarding this Privacy Policy should first contact OrthoXel at:

OrthoXel  
Rubicon Business Centre  
Bishopstown  
T12 Y275  
Cork  
Ireland  
+353 (21) 242 9950

[info@orthoxel.com](mailto:info@orthoxel.com)

OrthoXel has further committed to refer unresolved privacy complaints under, the EU Data Protection Authorities (DPAs). If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit: [http://ec.europa.eu/justice/data-protection/individuals/misuse-personal-data/index\\_en.htm](http://ec.europa.eu/justice/data-protection/individuals/misuse-personal-data/index_en.htm) for more information and to file a complaint.

### **Contact Point to Update, Correct Delete or Otherwise Access Personal Information**

EU individuals have the right to access personal data about them, and to limit use and disclosure of their personal data. If you wish to request access, to limit use, or to limit disclosure, please download our [Data Deletion Request Form](#) available within the privacy page on the website or email our privacy team at [info@orthoxel.com](mailto:info@orthoxel.com) or send a written request to the contact information provided below.

If at any time after registering for information, your personal information changes or you change your mind about receiving information from us, send us a request specifying updated information or your new choice. Simply send your request to [info@orthoxel.com](mailto:info@orthoxel.com) or telephone or postal mail at the contact information listed below.

### **Notice of the Data Storage or Processing**

We reserve the right to make changes to this Privacy Policy at any time. Please check this Privacy Policy when you use our website to ensure that you are aware of any changes in our privacy practices. Our Privacy Policy will indicate the date it was last updated.

We will not keep your personal data for longer than is necessary for the stated purposes.

We will take all reasonable and necessary technical and organisational measures to protect your personal data.

## **CONTACT POINTS**

Please contact us to learn more about our privacy practices or to change your privacy choices:

**OrthoXel**  
Rubicon Business Centre  
Bishopstown  
Cork, T12 Y275  
Ireland  
+353 (21) 242 9950  
[info@orthoxel.com](mailto:info@orthoxel.com)