



CONFIDENTIAL

EnigmaReach Mobile App Privacy Notice

Last Updated: May 2024

Ovarro LD Limited of Ovarro House, Parklands Business Park, Denmead, Hampshire, P07 6XP ("Ovarro", "us" or "we") is committed to protecting and respecting individual's privacy.

This notice sets out the basis on which Ovarro processes your personal data provided directly from you or your employer or another entity that has authorised you to access the EnigmaREACH App.

This notice applies to the use of:

The EnigmaREACH mobile device-based software used to receive, capture and send data to Ovarro's business customer's profile on Ovarro's Atrium platform ("**the App**"), once you have downloaded a copy of the App onto a mobile telephone or a tablet ("**Device**") or access a preinstalled App.

Any of the services accessed via the App are provided under an agreement our business customer (your employer or any relevant third-party) have entered into with Ovarro.

Information We Collect About Users

We may collect and process the following data about you ("the User" of the App):

Information you give us: you may give us certain information about you by registering on and using the App, or send to us via the App. The information you give us may include name, address, e-mail address, the Device's phone number and location and any information within the photos shared via the Device.

Personal Data your employer (or relevant third party) provides to us: as you are accessing the App as a result of an agreement your employer (or any relevant third-party) has concluded with us, we also process personal data about you which your employer has provided to us to validate that you are an authorised user or so we can arrange your training on how to use the App and this may include your name and e-mail address.

The legal basis for processing such data for the use of the App is our legitimate interest to provide the services to your employer, or relevant third party we have an agreement with.

Our business-to-business agreement, or our global privacy notice, as applicable, will apply to processing of the data. This notice is supplementary to our global Privacy Notice available at ovarro.com.

Each time you use the App we may automatically collect the following information:

- Technical information, including the type of Device, a unique device identifier (for example, Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, mobile operating system, the type of mobile browser used, time zone setting, ("Device Information"); or
- We may also use GPS technology (or information from nearby Wi-Fi access points (like MAC address and signal strength) and cell towers where GPS is not available) to determine the Device's current location when operating the App. Users can

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withdraw their consent at any time by changing the permission setting on the Device. However, to enable us to provide the relevant services it is necessary for appropriate location data to be transmitted to us with each record (either via Users filling in the necessary data capture fields within the App or directly from the Device). If you prevent the Device from transmitting appropriate location information or fail to otherwise provide us with appropriate location data we cannot guarantee our ability to be able to provide the relevant services.

Uses Made of The Information

We use information held about you to ensure that you are an authorised user for the App and to be able to provide the services.

We may also use the information collected about you for the purposes of:

- Contacting Users about training of the use of the App.
- Dealing with Users' requests and enquiries.
- Carrying out customer and marketing research; and
- Providing users with information about products and services offered by Ovarro.

At any time, you have the right to unsubscribe or withdraw your consent to our processing of your personal data for marketing purposes. To withdraw consent, please email: marketing@ovarro.com.

Disclosure of Users' Information

We may disclose some or all of the data we collect from users of the App to third parties (including other companies within our group) and authorised members of companies with whom we are contracted or who assist us to deliver the relevant services and/or help us analyse and fix issues in the App or any linked systems and services.

We may also in limited circumstances 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 personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share personal data in order to comply with any legal or regulatory obligation or request; or
- In order to:
 - Properly administer the App; or
 - Protect the rights, property or safety of Ovarro, our customers, or others.

Personal Data Security

The App is controlled and operated by Ovarro from the United Kingdom.

We use industry-standard encryption services when transferring and receiving data and information provide to us is stored on our secure servers. 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 the data in transmission; any transmission is at your own risk.

Measures we use to maintain the security of the data include:

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- Making regular backups of files.
- Protecting file servers and workstations with virus scanning software.
- Using a system of passwords so that access to data is restricted.
- Allowing only authorised staff into certain computer areas.
- Using data encryption techniques to code data when in transit.
- Ensuring that staff are only given sufficient rights to any systems to enable them to perform their job function.

Data Retention

We take every reasonable step to ensure that personal data is only processed for the minimum period necessary for the purposes set out in this Privacy Notice, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with our customer or the data processing. In some circumstances you can ask us to delete your data: see Users' Rights section below for further information.

In some circumstances we may anonymise the personal data (so that it can no longer be associated with you) for research or statistical purposes, or in order to improve our services, in which case we may use this information indefinitely without further notice.

Users Rights

Under certain circumstances you may have the rights outlined below under data protection laws in relation to your personal data. The rights below are likely to apply to users if you are based in the UK or the European Union:

- Request access to their personal data (commonly known as a "data subject access request"). This enables users to receive a copy of the personal data we hold about them and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about Users. This enables users to have any incomplete or inaccurate data we hold about them corrected, though we may need to verify the accuracy of the new data they provide to us.
- Request erasure of user's personal data. This enables users to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase their personal data to comply with local law. Note, however, that we may not always be able to comply with users' request of erasure for specific legal reasons which will be notified to them, if applicable, at the time of their request.
- Object to processing of their personal data where we are relying on a legitimate interest (or those of a third party) and there is something about their particular situation which makes you want to object to processing on this ground as they feel it impacts on their fundamental rights and freedoms. Users also have the right to object where we are processing their personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process the information which override their rights and freedoms.
- Request restriction of processing of your personal data. This enables users to ask us to suspend the processing of their personal data in the following scenarios:
 - (a) if users want us to establish the data's accuracy.
 - (b) where our use of the data is unlawful, but users do not want us to erase it.

(c) where users need us to hold the data even if we no longer require it as they need it to establish, exercise or defend legal claims; or

(d) Users have objected to our use of the data, but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which users initially provided consent for us to use or where we used the information to perform a contract with them.
- Withdraw consent at any time where we are relying on consent to process personal data. However, this will not affect the lawfulness of any processing carried out before they withdraw your consent. If users withdraw their consent, we may not be able to provide certain products or services to you or your employer. We will advise if this is the case at the time they withdraw your consent.

Requests under this section should be made to gdpr@ovarro.com using the heading GDPR. For subject access requests - please, send us an e-mail at gdpr@ovarro.com and request our subject access request form which you can fill in and e-mailed back to us.

You can also write to us at Data Protection Working Committee (DPWC), Rotherside Road, Eckington, Sheffield, UK, S21 4HL.

If we receive a request from you to exercise any of the above rights, we may ask them to verify their identity before acting on the request. This is to ensure that the data is protected and kept secure.

You also have the right complain to the Information Commissioner's Office if you are not satisfied with our use of the data (<https://ico.org.uk>). We would, however, appreciate the chance to deal with your concerns before they approach any such authority and would ask you to contact us in the first instance by using the contact information above.

For information on local data protection authorities within the EU, please visit: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

Third Parties Websites

The App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

Changes To This Privacy Notice

Ovarro may update this notice at its sole discretion. Any changes we may make to our privacy notice in the future will be notified to you. However, it is your responsibility to check the Terms regularly for any updates.

Your continued access to or use of the App and any related services after any update constitutes your acceptance of the notice current at this time. If you do not agree to any changes, you must stop accessing or using the App.