



JointManager – Privacy Notice

04/06/2026

Purpose & Scope

This Privacy Policy explains how we (Ovarro Group Ltd, “Ovarro”, and its subsidiaries) collect, use, store, and protect personal data when you use our JointManager platform (“JointManager”). We are committed to complying with all applicable national and international data protection and privacy management legislation.

Who Are We?

Data Controller:

Ovarro Group Ltd

Rotherside Road, Eckington, Sheffield, South Yorkshire, United Kingdom, S21 4HL

GDPR@Ovarro.com

What Personal Data We Collect

We collect only the data necessary to deliver pre-determined services, fulfil legal obligations, and maintain platform security.

a. Account & Identity Information

- Name
- Work email address
- Job title / department

b. Technical & Usage Data

- Login timestamps
- IP address
- Device/ browser information
- Session identifiers
- Error logs and performance metrics

c. Optional Data (only if provided)

- Accessibility preferences
- Feedback or survey responses



We do not collect special category data unless explicitly required and lawful (e.g., accessibility needs).

How We Use Your Personal Data

We process personal data for the following purposes:

- To create and manage user accounts
- To process contractual obligations and transactions through to completion
- To verify identity and maintain secure access
- To generate compliance reports
- To improve platform performance and user experience
- To meet legal and regulatory obligations
- To respond to data protection requests and complaints

We do not use your data for marketing, profiling unrelated to those services pre-defined as part of this platform, or automated decision-making that produces legal or significant effects.

Legal Bases For Processing

We rely on the following lawful bases under the UK GDPR:

- Article 6(1)(b) – Processing necessary for the performance of a contract (providing the purchased product).
- Article 6(1)(c) – Compliance with legal obligations (e.g. subject request reports)
- Article 6(1)(f) – Legitimate interests (platform security, service improvement).
- Article 6(1)(a) – Consent (only for optional features such as surveys)

Cookies and Tracking Technologies

We use strictly necessary cookies to maintain secure sessions and ensure platform stability.

These cookies are essential for the Platform to function and cannot be disabled. They do not track users across other websites or collect analytics.

How We Share Personal Data

We may share data with:

- Your employer
- Auditing Bodies
- Cloud hosting and IT service providers
- Regulators or authorities where legally required

We do not sell or rent personal data.



All third-party processors are bound by written data-processing agreements compliant with UK GDPR Article 28.

International Data Transfers

Where data is transferred outside the UK, we ensure appropriate safeguards such as:

- UK Addendum to the EU Standard Contractual Clauses
- UK International Data Transfer Agreement (IDTA)
- Adequacy regulations issued by the UK Government

Data Retention

We retain personal data only for as long as necessary:

- Product records: As per contractual requirements
- Account data: retained while the user remains active
- Technical logs: up to 12 months or as otherwise contractually agreed
- Complaints and data rights requests: up to 3 years

After retention periods expire, data is securely deleted or anonymised.

User Rights

You have the following rights:

- Right of access – obtain a copy of your data
- Right to rectification – correct inaccurate information
- Right to erasure – request deletion where applicable
- Right to restrict processing
- Right to data portability
- Right to object to certain processing
- Right not to be subject to automated decision-making

To exercise your rights, contact: gdpr@ovarro.com

Security Measures

We implement technical and organisational measures including:

- Encryption in transit and at rest
- Multi-factor authentication
- Role-based access controls
- Secure development practices
- Continuous monitoring and logging



Complaint Handling

Ovarro's ensures all complaints are handled with the upmost care and attention whilst aligning to all national and international legislation.

a. How to Submit a Complaint

- You may submit a complaint about how your personal data has been processed via:
- Email: GDPR@ovarro.com
- Postal address: Rotherside Road, Eckington, Sheffield, South Yorkshire, United Kingdom, S21 4HL

b. Acknowledgement of Complaints

We will:

- Acknowledge receipt within 30 days
- Explain the next steps and expected timelines

c. Investigation Process

We will:

- Conduct a fair and impartial investigation
- Review relevant logs, records, and system activity
- Contact you if further information is required
- Provide a written outcome

d. Response Timeframes

After the initial acknowledgement within 30 days of receipt, Ovarro will resolve all complaints without undue delay.

e. Escalation Options

If you are dissatisfied with our response, you may escalate to:

- Your employer's data protection representative (if applicable)
- The Information Commissioner's Office (ICO) if UK-based, or other national supervisory authority.
- We will provide details of escalation routes in our written response.

Changes To This Policy

We may update this Privacy Notice to reflect changes in law or platform functionality. Significant changes will be communicated to users directly.

Contact Us

For questions about this Privacy Policy or your data rights:



GDPR@ovarro.com

Rotherside Road, Eckington, Sheffield, South Yorkshire, United Kingdom, S21 4HL