



Privacy Policy

Welcome to ExpHand Prosthetics and our website at www.exphandprosthetics.com. For your current and any further visits to our website, we would like to inform you about data collection, processing and use when visiting and using our service.

General Information

a) What is Personal Data?

Personal Data is any information relating to personal or material circumstances that relates to an identified or identifiable individual. This includes, for example, your name, date of birth, e-mail address, postal address, or telephone number as well as online identifiers such as your IP address. In contrast, information of a general nature that cannot be used to determine your identity is not Personal Data. This includes, for example, the number of users of a website.

b) What is processing?

"Processing" means any operation or set of operations which is performed upon Personal Data, whether or not by automatic means. The term is broad and covers virtually any handling of data.

c) What law applies?

In principle, we will only use your Personal Data in accordance with the applicable data protection laws, in particular the UK's Data Protection Act ("DPA") and the EU's General Data Protection Regulation ("GDPR"), and only as described in this Privacy Policy.

d) Responsible for data processing

Responsible for data processing is ExpHand Prosthetics of The Studio, Holywell Building, Loughborough, LE11 3UZ ("ExpHand Prosthetics", "we", "us", or "our"). We act as the data controller and ask you to direct all questions about your Personal Data directly to us. You can reach us using our [Contact Form](#), or per e-mail using kate@exphandprosthetics.com, or call +44 7411 906924.

e) Purpose and legal basis of processing

In accordance with the DPA and GDPR we need to have both a purpose and a legal basis to process Personal Data. The purposes are:

- providing the website its functions and contents,
- responding to contact requests and communicating with our customers,
- providing our services, and
- security measures.

Of course, we can only do that if we have at least one of the following legal bases or in other words lawful reasons to do so. Unless specifically described below, we typically link the above purposes to one of the following:

- consent,
- to fulfil our services and carry out contractual obligations,
- to fulfil our legal obligations, and
- to protect our legitimate interests.

General Principles

a) Security

Our website uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content, such as orders, login data or contact requests that you send to us.

You can recognise an encrypted connection if the address line of your browser contains a "https://" instead of a "http://" and also has a lock symbol. If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.



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We have also implemented numerous security measures (“technical and organisational measures”) for example encryption or need to know access, to ensure the most complete protection of Personal Data processed through this website.

Nevertheless, internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed. And databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion.

Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised as expeditiously as possible after which the breach was discovered.

b) Minors

We will not knowingly collect, use, or disclose personal information from minors without first obtaining consent from a parent or legal guardian through direct contact.

c) Automated decision-making

Automated decision-making is the process of making a decision by automated means without any human involvement. Automated decision-making including profiling does not take place.

d) Do Not Sell

We do not sell your Personal Data.

e) Special Category Data

Unless specifically required when using our services and consent is obtained for that particular service, we do not process special category data.

f) International Transfer

We may transfer your Personal Data to other companies and/or business partners as necessary for the purposes described in this Privacy Policy. In doing so, your Personal Data may be transferred to so called third countries. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organisational measures to protect the Personal Data we transfer.

g) Storage and retention

Your personal data will be stored by us only for as long as is necessary to achieve the purposes for which the data was collected or - if statutory retention periods exist that go beyond this point and for the duration of the legally prescribed retention period. We then delete your personal data. Only in a few exceptional cases is your data be stored beyond this period, e.g., if storage is necessary in connection with the enforcement of and defence against legal claims against us.

h) Sharing and Disclosure

We will not disclose or otherwise distribute your Personal Data to third parties unless this is a) necessary for the performance of our services, b) you have consented to the disclosure, c) or if we are legally obliged to do so e.g., by court order or if this is necessary to support criminal or legal investigations or other legal investigations or other legal proceedings; as required by law or regulation; or proceedings at home or abroad or to fulfil our legitimate interests.

Data we collect automatically

a) Collection of access data and log files

We also collect data on every access to our website. The access data includes the name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access,



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browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

Log file information is stored for security reasons (e.g., for the clarification of abuse or fraud) for a maximum of 7 days and then deleted. Data whose further storage is necessary for evidentiary purposes is exempt from deletion until the respective incident is finally clarified. The legal basis for the data processing is our legitimate interest in providing an appealing website.

b) Hosting

To provide our website, we use the services of [Wix.com](https://www.wix.com) who process all data to be processed in connection with the operation of our website on our behalf. The legal basis for the data processing is our legitimate interest in providing our website.

c) Content Management System

For our web development services we use the website builder Wix of the Israeli company [Wix.com](https://www.wix.com). By using Wix, personal data of you may also be collected, stored and processed. Wix always stores data until it is no longer required for the service provided. The legal basis for the data processing is our legitimate interest in providing our website.

d) Use of cookies

We use so-called cookies on our web site. Cookies are small text files that are stored on your respective device (PC, smartphone, tablet, etc.) and saved by your browser. For further information please refer to our Cookie Policy. The legal basis for the use of cookies is your consent as well as our legitimate interest.

Data we collect directly

a) General

We may ask you for Personal Data when you:

- use our website,
- request services, support, or information,
- order our prosthetics,
- participate in our Beta Trial,
- interact with us on third-party social networking sites (subject to the terms of use and privacy policies of said third parties), or
- contact us.

Categories of Personal Data we collect may include:

- contact data (e.g., names, e-mail, telephone numbers),
- content data (e.g., text entries, messages),
- Identity data (e.g., including name, address, and e-mail address), and
- contract data (e.g., prosthetics information, delivery details, payment confirmations),

b) Contacting us

Personal Data is processed depending on the contact method. In addition to your name and e-mail address, IP address or telephone number, we usually collect the context of your message which may also include certain Personal Data. The Personal Data collected when contacting us is to handle your request and the legal basis is both your consent and Contract.

For the Chat, we use Ascend by [Wix.com](https://www.wix.com). We have no influence on the processing of data by Wix and no possibility to influence it.



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We are present on social media ([Facebook](#), [Instagram](#), [Twitter](#) and [LinkedIn](#)) on the basis of our legitimate interest. If you contact or connect with us via social media platforms, we and the relevant social media platform are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The legal basis is our legitimate interest, your consent or, in some cases, the initiation of a contractual service, if any.

c) When you Order Online

We process your data (e.g., including name, delivery address, and e-mail address) in order to be able to fulfil and deliver your order. Accordingly, the legal basis for the data processing is the fulfilment of our contractual obligations and, in individual cases, the fulfilment of our legal obligations as well as your consent.

d) Administration, financial accounting, office organisation, contact management

We process data in the context of administrative tasks as well as organisation of our operations, financial accounting and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing our services. The purpose and our interest in the processing lies in the administration, financial accounting, office organisation, archiving of data, i.e., tasks that serve the maintenance of our business activities, performance of our tasks and provision of our services.

g) Comments and contributions

Within the comment function of our blog, you may be able to display certain information, share certain details, knowledge and insights, post and view relevant content. It's your choice whether to include sensitive information on your comment and to make that sensitive information public. Please do not post or add personal data to your profile that you would not want to be available. The legal basis for the storage is our legitimate interest and your consent.

e) Newsletter

If you have consented to receive our newsletter, we will use your e-mail address and, if applicable, your name to send you information about us, our books and publications, promotions, and news. You can revoke your consent to receive the newsletter or to the creation of personalised user profiles at any time with effect for the future. You will find the unsubscribe link at the end of each newsletter. The revocation leads to the deletion of the collected user data. Our newsletter is sent as part of processing on our behalf by [Wix.com](#) to whom we pass on your e-mail address for this purpose.

f) When you watch our videos

On our website, we implement videos of the video portal "YouTube" of the company [Google LLC](#). When you call up a page that has an embedded video, a connection is established to Google's servers and in the process the content is displayed on the website by notifying your browser. According to Google's information, in "extended data protection mode" your data - in particular which of our Internet pages you have visited as well as device-specific information including the IP address - is only transmitted to the YouTube server in the USA when you watch the video. By clicking on the video, you consent to this transmission.

Your Rights and Privileges

a) Privacy rights

Under the DPA and the GDPR, you can exercise the following rights:

- *Right to information*
 - You have the right to request information and/or copies of the personal information stored about you.
- *Right to rectification*



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- You have the right to request that personal information relating to you be corrected and/or completed without delay.
- *Right to object to processing*
 - You have the right to request the restriction of the processing of your personal information, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its erasure and we no longer require the data, but you need it for the assertion, exercise or defence of legal claims or you have lodged an objection to the processing.
- *Right to deletion*
 - You have the right to request the erasure of your personal information stored by us, unless the exercise of the right to freedom of expression and information, the processing is necessary for compliance with a legal obligation, for reasons of public interest or for the assertion, exercise, or defence of legal claims.
- *Right to information*
 - Where you have exercised the right to rectification, erasure, or restriction of processing, we will notify all recipients to whom personal information relating to you has been disclosed of such rectification or erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort.
- *Right to data portability*
 - You have the right to have personal information that you have provided to us handed over to you or to a third party in a structured, common, and machine-readable format. If you request the direct transfer of the data to another responsible party, this will only be done insofar as it is technically feasible.
- *Right of objection*

Insofar as your personal information are processed on the basis of legitimate interests, you have the right to object to the processing at any time. If we process your data for the purpose of direct marketing, you have the right to object at any time to the processing of personal information concerning you for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing.
- *Right to withdraw consent*

You have the right to cancel your consent to the collection of data at any time with effect for the future. The data collected until the cancellation becomes legally effective will remain unaffected. Please understand that the implementation of your cancellation may take a little time for technical reasons and that you may still receive messages from us in the meantime.

If you have any questions or would like to enforce your rights, please contact us.

b) Updating your information

If you believe that the information, we hold about you is inaccurate or request its rectification, deletion, or object to its processing, please do so by contacting us.

c) Withdrawing your consent

You can withdraw consents you have given at any time by contacting us.

d) Access Request

In the event you want to make a Data Subject Access Request, please contact us. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to



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respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

e) Complaint to a supervisory authority

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in the UK is: The Information Commissioner`s Office (ICO) is located at Wycliffe House, Water Ln, Wilmslow SK9 5AF, UK www.ico.org.uk

Validity and questions

This Privacy Policy was last updated on Saturday, 01 April 2023 and is the current and valid version. However, we want to point out that from time to time due to actual or legal changes a revision to this policy may be necessary. If you have any data protection questions, please feel free to contact us.