



## NeurOn Limited Privacy Notice

**NeurOn is committed to protecting and respecting your privacy.**

This Privacy Notice together with our Terms of Use and any other documents referred to in it sets out how NeurOn collects, uses, maintains and discloses Personal Data, including any information provided through our website(s) (the "**Website**").

Your privacy is of the utmost importance to us. Please read this Privacy Notice carefully to understand our views and practices regarding your personal data and how we will treat it.

Whenever you provide personal information, we are legally obliged to use it in accordance with the laws concerning the protection of personal information.

### **Who we are**

**NEURON LIMITED** is a company incorporated and registered in England and Wales with company number 11323033 whose registered office address is Centrum, Norwich Research Park, Norwich, England, NR4 7UG ("**NeurOn**")

For the purposes of the Data Protection Act 2018, the General Data Protection Regulations and any other applicable data protection and privacy laws and regulations ("**Data Protection Legislation**"), NeurOn will be the 'data controller' for all personal information that we determine the means and purpose of processing.

If you are a user of a service using NeurOn software ("**NeurOn Client**"), we will be the 'data processor' for the NeurOn Client. If you wish to discover how your data is handled under Data Protection Legislation, please refer to the privacy notice belonging to the NeurOn Client.

By "**Personal Data**" we refer to information collected or held by NeurOn, that identifies and relates to you as an individual.

### **Information we may collect**

We may collect personal information about you when you request our services, including:

- your name;
- postal address;
- invoicing details/address;
- information regarding the services you request;
- occupation and/or professional position;
- supplementary information you provide us about yourself when contacting us;
- email address; and
- telephone numbers (including mobile).

We may also collect technical information about you when you visit the Website. This information may include the Internet protocol (IP) address used to connect your computer to the Internet, your browser type and version, time zone setting, operating system and platform, browser plug-in types and version,



the full URL clickstream to, through and from the Website, page response times, download errors, length of visits to certain pages, page interaction (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page.

The collected information is used to provide an overview of how people are accessing and using the Website. It is not used for any additional purpose, such as to profile those who access the Website.

Please see the "**Cookies**" section for further information.

### **What do we do with the information we collect?**

We will use your personal information for a number of purposes including:

- internal record keeping;
- to carry out any obligations owed to you through the use of our Website and in respect of any contracts entered into between you and us;
- to give you information that you request from us and to improve our services;
- to notify you about changes to our services;
- to allow us to operate the Website efficiently;
- to ensure that the content from our Website is presented in the most effective manner for you and your computer;
- any relevant troubleshooting, testing or statistical analysis as appropriate; and
- to keep the Website secure. Where we have your permission to do so, we may also use the information collected to:
  - provide you with information about our services that we offer via marketing communications; and
  - keep you up to date with features on the Website,

however, you can opt-out of any of these data uses at any time by emailing [help@neuropsychology.online](mailto:help@neuropsychology.online).

### **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **Legal basis of processing**

We will only process your information for as long as we have a relevant legal basis to do so. This is usually in order to provide you with the contractual services you have requested from NeurOn or if you have provided us with adequate consent to process your information for other purposes.



If we choose to process your information under the legal basis of legitimate interests, we will always inform you of our legitimate business interest and your right to object.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [help@neuropsychology.online](mailto:help@neuropsychology.online).

### **Protecting your information**

We are committed to ensuring that your information is secure and we have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we collect online.

All the Personal Data collected by us and stored electronically is held on a secure server in the EEA only. Where required, this information is encrypted for additional security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and we authorise access to Personal Data only for those employees who require it to fulfil their job responsibilities.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

### **Transfer of data outside of the EU**

We shall not transfer any personal data to any country outside of the European Economic Area unless we ensure that such personal data is subject to an adequate level of protection and appropriate legal safeguards in accordance with Data Protection Legislation.

### **Sharing your information with others**

Please be assured that we will not share your information for any other reason unless we are required by law or permitted to do so under this Privacy Notice. The main circumstances in which we will be permitted or required to disclose this is by law will be by court order, to government bodies and law enforcement agencies. However, sometimes we may share your information with third parties in the following ways:

- we may use carefully selected sub-processors to help us collect, store or manage your information. This will always be managed under the terms of a written data processing agreement;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website; and
- if NeurOn is acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets. We process your personal information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal information in this way, the relevant seller or buyer of our business may not be able to provide services to you.



### **Access to your Personal Data**

You have rights in relation to any Personal Data that we hold about you. If you wish to access your Personal Data you may make a formal subject access request by contacting NeurOn.

The information you request must relate to you or another person that you have authority to act on their behalf. NeurOn will require a confirmation of your ID prior to providing any information about the data we hold. If you are unable to provide sufficient information to prove your ID, NeurOn reserves the right to refuse your request for access to Personal Data. The rights you have in relation to the Personal Data we hold regarding you are:

- the right to rectify any inaccuracies in the information we hold;
- the right to erasure of information in specific circumstances;
- the right to request transfer of your information to another controller; and
- the right to object to processing in certain circumstances.

If you have provided us with consent to process your information, you always reserve the right to withdraw this consent via the method detailed in the paragraph below. We are committed to ensuring that your wishes are respected and upon notification that you wish to withdraw your consent, NeurOn will immediately cease processing the information in question.

Please send your request to NeurOn by emailing [help@neuropsychology.online](mailto:help@neuropsychology.online). We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Changes to this Privacy Notice**

We may change this Privacy Notice at any time to ensure it always accurately reflects the way we collect, use and safeguard your Personal Data.

Please check this notice from time to time to ensure you are aware of any updates we may have made to our Personal Data handling practices. The date of the changes will be listed in the 'Last updated' section below. We will endeavour to notify all of our current clients of any updates to this notice via email and we will post the relevant announcement on our website homepage.

We recommend that you print a copy of this page for your reference.

### **Cookies**

A cookie is a small data file that certain websites write to your hard drive when you visit them. The only Personal Information a cookie can obtain is information supplied by the user. A cookie cannot read data from your hard disk or read cookie files created by other sites.

You can refuse cookies by turning them off in your web browser and you do not need to have cookies turned on to successfully use our website. Most browsers are defaulted to accept and maintain cookies and you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or not.

We use the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

**Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Source	Cookie	Type	Purpose
Google Analytics	various	Performance	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. <a href="#">Click here for an overview of privacy at Google</a>

### How can you make a complaint?

Please note that if you are not satisfied with the processing of your personal data as set out in this Privacy Notice, please contact us at [neil@neuropsychology.online](mailto:neil@neuropsychology.online).

You have the right to issue a complaint directly with the Information Commissioners Office, the data protection supervisory authority for England and Wales (<https://ico.org.uk/concerns/>).

### Contacting us

Please contact us at [help@neuropsychology.online](mailto:help@neuropsychology.online) if you have any questions, comments or requests regarding this Privacy Notice.

*Last updated July 2018*