

Applicable Ltd application privacy policy

Applicable Ltd (We) are committed to protecting and respecting your privacy.

SCOPE OF POLICY

This policy together with our end-user licence agreement as set out at www.smart-gp.co.uk (**EULA**) applies to your use of:

- the Applicable Ltd application software, as well as of the data supplied with that software (**App**) available on our site (**App Site**), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**); and
- Any of the services accessible through the App (**Services**) that are available on the App Site or other sites of ours (**Services Sites**).

This policy sets out the basis on which any personal data We collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it. Please refer to the EULA for more information on data protection issues arising in respect of such third party personal data.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Submitted Information:** information that you provide by filling in forms on the App Site and the Services Sites (together Our Sites). This includes information provided at the time of registering to use the App or any of the Services. All passwords are encrypted at the time of registration so we neither store or have access at any time to unencrypted passwords.
- Additional information:
 - if you contact us, We may keep a record of that correspondence;
 - We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them;
 - details of your visits to any of Our Sites and the resources that you access.
- Device information: We may collect information about the Device or any computer you may use to download or stream a copy of the App onto your Device, including, where available, the Device's or computer's unique Device identifiers, operating system, browser type, for system administration and to collate aggregate information. We may associate Device information with Submitted Information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

- Location information: when you use one of our location-enabled Services, We may collect and process information about your actual location. However this data is anonymised and not linked to any user registration.
- Log information: when you use the Services or view content on Our Sites, We may automatically collect and store certain information in server logs, including but not limited to internet protocol (IP) addresses, internet service provider (ISP), clickstream data, browser type and language, viewed and exit pages and date or time stamps.

COOKIES

Our Sites may from time to time use cookies to distinguish you from other users of Our Sites. This may help us to provide you with a good experience when you use the App or browse Our Sites and also allows us to improve the App and Our Sites. For detailed information on the cookies We use and the purposes for which We use them, see the cookie policy on our website www.smart-gp.co.uk .

WHERE WE STORE YOUR PERSONAL DATA

The data that We collect from you will be transferred to, and stored at, a destination within the European Economic Area (EEA). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where We have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 your data transmitted to Our Sites; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- Device information: This will be gathered so that Applicable Ltd can ensure the apps are optimized for the majority of devices in use.
- Location information: This will be used to examine geographical trends in access to the app.

- E-mail addresses will be shared with the appropriate NHS or other organization for the purpose of monitoring access to any restricted information provided by that organization.

DISCLOSURE OF YOUR INFORMATION

We may 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 your personal data to the prospective seller or buyer of such business or assets.
 - If We are acquired by a third party, in which case personal data held by Applicable Ltd about its customers will be one of the transferred assets.
 - If We are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
 - In order to:
 - enforce or apply the EULA or to investigate potential breaches; or
 - protect the rights, property or safety of our customers, or others.
- This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if We intend to use your data for such purposes or if We intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data. You can also exercise the right at any time by contacting us directly.

Our Apps may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, 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.

ACCESS TO INFORMATION

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the

information We hold about you.

CHANGES TO PRIVACY POLICY

Any changes We may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or by notifying you of a change when you next start the App or log onto one of the Services Sites. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Applicable Ltd, The Priory, Priory Road, Wrentham, Beccles NR34 7LR.