

## OXFORD VR WEBSITE PRIVACY STATEMENT

### BACKGROUND:

OxfordVR understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <http://www.OxfordVR.org/> and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

We have adopted the principals of the General Data Protection Regulations (EU Regulation 2016/679) across our platforms in all countries as we believe this is a robust set of principles which proves our commitment to ensure we keep your personal data safe and secure at all times.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our site, and you will be required to read and accept this Privacy Policy. If you do not accept and agree with this Privacy Policy, you must stop using our site immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of our Site and/or when you use certain features of our Site. Details of the Cookies used by our Site are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

### 2. Information About Us

OxfordVR , is a company registered in England and Wales under number 10472107, whose registered office is at King Charles House, Park End Street, Oxford, OX1 1JD (“the Company”)

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of our site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about or collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly or we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office (United Kingdom), your local Citizens Advice Bureau (United Kingdom) or The Office of the Privacy Commissioner for Personal Data (Hong Kong).

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 6. What Data Do We Collect?

Depending upon your use of our Site, we may collect some or all of the following personal and non-personal data (please also see Part 14 on our use of Cookies and similar technologies and our Cookie Policy).

- Name
- Address
- Email address
- Telephone number
- Industry
- Business name
- Job title
- Gender
- Date of birth
- Education attainment
- IP address
- Web browser type and version
- A list of URLs starting with a referring site, your activity on our Site, and the site you exit to.
- Demographic information such as postcode, latitude, longitude, preferences and interests
- Clinical information such as treatment suitability and outcome tracking & measurement

- Appointment information for our services such as location, time, attendance status
- Other information relevant to customer surveys and/or offers

## 7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for one of the following purposes:

- Providing and managing your Account
- to fulfil your purchase order or contractual requirements
- Internal record keeping
- Providing and managing your access to Our Site
- Personalising and tailoring your experience on Our Site
- Supplying our products to you. Your personal details are required in order for us to enter into a contract with you
- Personalising and tailoring our products for you
- Communicating with you. This may include responding to emails or calls from you
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us)
- Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided, subject to you having agreed to this
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax, mail or SMS. We may use the information to customise the website according to your interests

With your permission and where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone and post with information, news, and offers on our products. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out Third Parties (including Distributors) whose content appears on our site may use third-party Cookies, as detailed below in Part 14. Please

refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reasons for which it was first collected. Your personal data will therefore be kept for the following periods or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- For the duration of our contractual relationship or until requested by you to cease our business relationship.

9. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the UK. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- We have implemented technical and operational controls to ensure the security of your personal data.

10. Do You Share My Personal Data?

We may contract with the following third parties to supply certain services. These may include processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold. For example; MailChimp (email marketing automation platform).

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11. How Can I Control My Personal Data?

11.1 In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via our site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails or at the point of providing your details and by managing your Account).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. Can I Withhold Information?

You may access certain areas of our site without providing any personal data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14 and our Cookie Policy.

## 13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our products. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on our site are used in accordance with current Cookie Law.

Certain features of our site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. You may block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that our site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
Compliance Cookie	used to remember a user’s choice about cookies on your website. Where users have previously indicated a preference, that user’s preference will be stored in this cookie	Yes

and the following third-party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
none		

Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our Site is used. This, in turn, enables us to improve our site and the products offered through it.

The analytics services used by Our Site uses Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable us to continually improve our Site, making it a better and more useful experience for you.

The analytics service used by our Site uses the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	First	Google Analytics	used to distinguish users - site visitors can choose to deny
_gid	First	Google Analytics	used to distinguish users - site visitors can choose to deny
_gat	First	Google Analytics	used to distinguish users - site visitors can choose to deny

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Data Protection Officer:

Katie Bedborough

Telephone: +44 (0) 7815 936 245

email [Katie@OxfordVR.org](mailto:Katie@OxfordVR.org)

16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available to you via email and our website