

**SPYRAS**  
RESPIRATORY ANALYTICS

## **SPYRAS WEBSITE PRIVACY POLICY**

### **Introduction.**

Welcome to the Spyras Website Policy!

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit [www.spyras.com](http://www.spyras.com), referred to herein as "website", and tell you about your privacy rights and how the law protects you.

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## 1. Important information and who we are.

### **Purpose of this privacy policy.**

This privacy notice aims to give you information on how Spyras collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our mailing list or to receive our newsletters, take part in a competition or take part in any beta testing we may run from time to time.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Controller.**

SPYRAS LTD, is the controller and responsible for your personal data (referred to in this privacy notice as "Spyras" "we", "us" or "our").

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### **Contact details.**

If you have any questions about this privacy notice or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: SPYRAS LTD (registered company in England and Wales with identification number 11514994) of 85 Great Portland Street Great Portland Street, First Floor, London, England, W1W 7LT.

Email address: [dataprotection@spyras.com](mailto:dataprotection@spyras.com).

Postal address: 85 Great Portland Street, First Floor, London, England, W1W 7LT.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Spyras is registered with the ICO with reference number ZA798650. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance. As a start-up, we are trying our best to ensure correct



procedures and good practices are implemented early and followed. If you notice something is missing or have a suggestion on how we can improve our services, then please do get in touch by using the above contact details.

### **Changes to the privacy notice and your duty to inform us of changes.**

We keep our privacy notice under regular review. This version was last updated on 27 October 2021. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by emailing us through [support@spyras.com](mailto:support@spyras.com) or updating your details through the appropriate means on the website.

### **Third-party links.**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, you do so at your own risk. We do not warrant, endorse, guarantee, or assume responsibility for the accuracy or reliability of any information offered by third-party websites linked through the site or any website or feature linked in any banner or other advertising. We will not be a party to or in any way be responsible for monitoring any transaction between you and third-party providers of products or services.

We encourage you to read the privacy notice of every website you visit and raise any questions or concerns you may have directly with the website provider independently of Spyras. If you do become aware of a linked website that is operating in such a way that is or could be damaging to Spyras and we should become aware of such failings, then please email [support@spyras.com](mailto:support@spyras.com) your concerns for us to investigate further.

## **2. The data we collect about you.**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** e.g. first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and identifying gender.
- **Contact Data** e.g. email address and telephone number.



- **Technical Data** e.g. Internet Protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** e.g. your feedback and survey responses.
- **Usage Data** e.g. information about how you use our website.
- **Marketing and Communications Data** e.g. any communications we may receive from you, and your preferences in receiving notifications, marketing and other communications from us and third parties.

We also collect, use and **share** **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) unless you purchase a Mobile Connected Product ("Mobile Connected Product") from Spyras or agree to participate in one of our Beta Testing Programmes ("Beta Testing Programme"), in which case we may collect and process personal data with your consent relating to your health in order to fulfil our promised services. Any Mobile Connected Product or Beta Testing Programmes will be governed by their own retrospective privacy policies in addition to this privacy policy and be made available for you to review and to accept. As mentioned previously, this privacy policy and any additional privacy policies are supplementary to one and other and no single policy is intended to override another. We do not collect any information about criminal convictions and offences.

### **If you fail to provide personal data.**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.



### 3. How your personal data is collected.

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Profile Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - participate in testing of Spyras products and or services;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or otherwise contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and /or other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

We use the following Cookies on our website:

Cookie Name	Purpose	Duration	Cookie Type
<b>Spyras</b>			
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	2 years	Essential
ssr-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
<b>Third Party</b>			
_ga	Used to identify unique users	2 years	Non-essential
_gat	Used to throttle the request rate	1 minute	Non-essential



Cookie Name	Purpose	Duration	Cookie Type
_gid	Used to group the user behaviour together for each user	24 hours	Non-essential
_hjFirstSeen	Used by Hotjar to identify a new user's first session	30 minutes	Non-essential
_hjTLDTTest	No description	Session	Non-essential
_hjid	Used by Hotjar to allocate a random user ID for future ID purposes	1 year	Non-essential
_hjAbsoluteSessionInProgress	No description	30 minutes	Non-essential

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

- **Third parties or publicly available sources.** We will receive personal data about you from our suppliers, including but not limited to Technical Data from analytics providers such as Google, or from publicly available sources such as Companies House and the Electoral Register based in the EU.

#### 4. How we use your personal data.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data save in respect of Special Category Personal Data which is processed pursuant to a Beta Testing Programme or Mobile Connected Product, although we will get your consent before sending third party direct marketing communications to you via email or text message. You



have the right to withdraw consent to participating in a Beta Testing Programme or Mobile Connected Product or marketing at any time by contacting us.

**Purposes for which we will use your personal data.**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [dataprotection@spyras.com](mailto:dataprotection@spyras.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)(b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business



<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
effectiveness of the advertising we serve to you	Communications (f) Technical	and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To enable you to participate in a Beta Testing Programme	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to define types of customers for our products and services in respect of Special Category Personal Data, with your express consent.

**Marketing.**

Here at Spyras, we would like to send you marketing communications from time to time to let you know about our services, and what we are up to that might be of interest to you!

We will only send you our newsletter or any other marketing communications if you have signed up to receive such communications via our website or through a Spyras mobile app. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link in an email or instructions provided in any email we send, or by emailing us [info@spyras.com](mailto:info@spyras.com).

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. To opt out of receiving marketing messages from such third parties, please follow the link in any marketing messages or contact the third party.

**Change of purpose.**

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.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data.**

We will share your data with:

a) Our trusted third party service providers ("Suppliers"). These include:

- our information technology providers, such as website and mailing list hosts;
- analysts, consultants and other professional advisors whom we retain for advice in respect of our business operations;
- if you enter into a competition and win, any companies which require your personal data (such as name and contact details) in order for you to receive your prize;

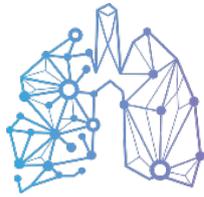
b) With any of our group companies (we do not have any currently but may do one day!);

c) To potential or actual buyers of, investors into or lenders to our business or any of our assets, or in the context of a reorganization of our business or a restructuring exercise, and any of the advisors or representatives of any such buyers, investors or lenders. If so, we will ensure that appropriate confidentiality terms are in place;

d) Regulators or law enforcement agencies, or any other party with whom we believe it is necessary to share your personal data in order to comply with the law or a legal request (including a court order of government inquiry); or

e) Other third parties, but only if we have your consent, for example, if we run a marketing campaign or survey pursuant to which you agree to provide your personal data to a third party (e.g. one of our advertising partners) in exchange for a benefit.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow such third parties to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



We also collect, use and share, for example with advertisers and our Suppliers, Aggregated Data such as statistical or demographic data for any purpose. In so doing, we will collect and combine your personal data with the data of others, and share it with third parties, in aggregated form (i.e. without names or otherwise in a manner which enables you or any other user to be directly or indirectly identified). For example, we may aggregate your usage data with the data of other members, in order to assess how popular a feature of the website or mobile app was. Such information can help our advertisers, Suppliers and other third parties identify trends, thereby enabling them to provide better and more relevant services which may interest you and other members.

If we combine or connect such aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## **6. International transfers.**

Where we transfer personal data outside of the UK or EEA to a recipient in a third country in the absence of an adequacy decision by the European Commission, we take care to ensure that our data exports are compliant with data privacy law; for example, we may use specific contracts approved by the European Commission or the UK Information Commissioner which are designed to give personal data the same protection it has in the UK and the European Union.

Please contact our Data Protection Manager ([dataprotection@spyras.com](mailto:dataprotection@spyras.com)) if you want further information on the specific mechanism used by us when transferring personal data out of the UK or EEA.

## **7. Data security.**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention.**



### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

You can request details of retention periods for different aspects of your personal data by contacting us.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research, statistical or commercial purposes, in which case we may use this information indefinitely without further notice to you.

### 9. Your legal rights.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data, in certain circumstances.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some



cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data, in certain circumstances.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Manager for further details. 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.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- End -

Date 27/10/2021

Revision B