

Website Privacy Policy

1. Introduction

We are Kneev Health Limited. We're a company registered in the Republic of Ireland with company number 780706.

In this Privacy Policy, we will refer to ourselves as '**we**', '**us**' or '**our**'. We are the Data Controller of the personal information we collect, hold and use about you, as explained in this Policy.

You can get hold of us in any of the following ways:

1. by emailing us at info@kneevhealth.com or
2. by writing to us at 22 The Links, Elm Park, Merrion Road, Dublin 4, Ireland.

We take the privacy, including the security, of personal information we hold about you seriously. This privacy policy is designed to inform you about how we collect personal information about you and how we use that personal information. You should read this Privacy Policy carefully so that you know and can understand why and how we use the personal information we collect and hold about you.

It is important that you keep your personal information up to date. If any of your personal information changes, please contact us as soon as possible to let us know. If you do not do this, then we may be prevented from supplying the goods to you (for example, if you move address and do not tell us, then your goods may be delivered to the wrong address).

We do not have a data protection officer, but if you have any questions about this privacy notice or issues arising from it, you should contact Sherry Garg who is responsible for matters relating to data protection at our organisation, including any matters in this privacy notice. You can contact them using the details set out above.

We may update this Privacy Policy from time to time. This version was last updated on 12-March-2025.

2. What Personal Data We Collect About You

We may collect the following data about you:

- Your name

- Your email address
- Your address
- Your phone number
- Your date of birth
- Your business name
- Your financial details
- Any personal data you post on our website
- Data about how you use our website
- Technical data such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website
- Your marketing and communication preferences
- Any other information that you directly provide to us whether through our contact form, over the phone, by email or otherwise, such as when entering a competition or completing a survey

The types of personal data we collect about you may differ from person to person, depending on who you are and the relationship between us.

3. How We May Use Your Data

We will use your data in order to:

- Process financial transactions to enable you to purchase our goods, our products or services
- Send you customer communications about enhancements to products or services you have bought
- Enable us to perform a contract with you and process orders, respond to enquiries related to the order and deal with complaints
- Reply to any enquiries you make about our products or services

- Send you marketing communications where we are allowed by law to do so
- Personalize your experience on our websites
- Monitor the use of our website and online services
- Ask you to complete surveys or invite you to enter into competitions or prize draws
- Keep records of orders placed and communications in relation to such orders
- Keep records of communications
- Analyse your use of our website and other online services
- Administer and protect our business and website
- Deliver relevant website content and advertisements to you
- Understand the effectiveness of our advertising
- Bring legal claims against you if you breach a contract or fail to make payment (we know you won't....)
- Comply with any legal obligations we are subject to or as required by a government authority
- Obtain or maintain insurance policies
- Manage our business

Under data protection laws, we can only use your personal information for the purposes we have told you about, unless we consider that the new purpose is compatible with the purpose(s) we told you about. If we want to use your personal information for a different purpose that we do not think is compatible with the purpose(s) we told you about, then we will contact you to explain this, and what legal reason is in place to allow us to do this.

4. Our Lawful Ground of Processing

Under the General Data Protection Regulations (GDPR), we are only legally able to process your personal data if we have a lawful ground for doing so.

Our lawful grounds of processing are:

- In relation to Customer Data that we have obtained in relation to you placing an order with us that we hold for the purpose of fulfilling that contract, informing you about updates to the product or service and keeping records of the contract, the processing is necessary for the performance of a contract to which you are subject and for our legitimate interests in informing you about updates to the product or service and to keep records for our business
- In relation to Prospect Data that we have obtained when you enquired about our products or services (whether that be through our website or otherwise) and that we process in order to reply to your enquiry and keep records of this, the processing is necessary in order to take steps at your request prior to entering into a contract and for our legitimate interests in record keeping for our business
- In relation to Prospect Data that we have obtained when you signed up for any of our free resources and that we process in order to send you those free resources, reply to your communications about the resources and to keep relevant records, you have given consent to the processing for the purposes of us sending you the free resource and it is in our legitimate interests to reply to your communications and to keep records for our business.
- In relation to Marketing Data that we have obtained when you told us your marketing preferences, when you consented to us sending you details of our products and services, for the purposes of us sending you marketing communications, enabling you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising, the processing is necessary for our legitimate interests which in this case are to study how customers and users use our products/services, to develop them, to grow our business and to decide our marketing strategy.
- In relation to User Data that we have obtained through cookies on our website or other online services for the purposes of operating our website, ensuring relevant content is provided to you, ensuring the security of our website, maintaining back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business, the processing is necessary for the purposes of our legitimate

interests which in this case are to enable us to properly administer our website and our business.

- In relation to Technical Data (that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website), we process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
- In relation to your data that we process in order to comply with legal requirements or as required by a government authority, the processing is necessary for compliance with a legal obligation to which we are subject.
- In relation to keeping records, this processing is either necessary for compliance with a legal obligation that we are subject to or for our legitimate interests in responsible business operations.

We do not collect any Sensitive Data about you. Sensitive data refers to data that 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.

We do not collect any information about criminal convictions and offences.

5. How We Collect Your Personal Data

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). This includes the personal information that you provide to us when you subscribe to our mailing list or enter a survey. We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy (kneevhealth.com/cookies-policy) for more details about this

We may receive some of your personal data from third parties such as analytics providers such as Google based outside Ireland, advertising networks such as

LinkedIn based outside Ireland, such as search information providers such as Google based outside Ireland, providers of technical, payment and delivery services, fraud detection agencies and data brokers or aggregators.

6. Marketing Communications

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the ePrivacy Regulations, we may only send you email or text marketing communications if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and, in each case, you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes, we will get your express consent.

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at info@kneevhealth.com.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases etc.

7. Disclosures Of Your Personal Data

We may need to share your personal information with other organisations or people. These organisations include:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, accountants, auditors and insurers.
- Government bodies that require us to report processing activities or otherwise disclose your personal data.
- Market researchers and fraud prevention agencies.

- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- any organisations that propose to purchase our business and assets, in which case we may disclose your personal information to the potential purchaser.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

We do not sell or trade any of the personal information that you have provided to us.

8. Transfers to countries outside of the EEA

If any transfer of personal information by us will mean that your personal information is transferred outside of the EEA we are subject to the provisions of the Irish General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of Ireland, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

- We may transfer your personal data to countries that Irish authorities have approved as providing an adequate level of protection for personal data by; or
- If we use US-based providers that are part of a privacy framework (such as the successor to the US Privacy Shield), we may transfer data to them, as they have equivalent safeguards in place; or
- Where we use certain service providers who are established outside of Ireland, we may use specific contracts or codes of conduct or certification mechanisms approved by Irish authorities which give personal data the same protection it has in Ireland

9. Data Security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners

who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

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

10. Data Retention

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

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11. Your Legal Rights

Under data protection laws, you have certain rights in relation to your personal information, as follows:

- **Right to request access:** (this is often called 'subject access'). This is the right to obtain from us a copy of the personal information that we hold about you. We must also provide you with certain other information in response to these requests to help you understand how your personal information is being used.
- **Right to correction:** this is the right to request that any incorrect personal data is corrected and that any incomplete personal data is completed.
- **Right to erasure:** (this is often called the 'right to be forgotten'). This right only applies in certain circumstances. Where it does apply, you have the right to request us to erase all of your personal information.

- **Right to restrict processing:** this right only applies in certain circumstances. Where it does apply, you have the right to request us to restrict the processing of your personal information.
- **Right to data portability:** this right allows you to request us to transfer your personal information to someone else.
- **Right to object:** you have the right to object to us processing your personal information for direct marketing purposes. You also have the right to object to us processing personal information where our legal reason for doing so is the Legitimate Interests Reason (see section 4 above) and there is something about your particular situation that means that you want to object to us processing your personal information. In certain circumstances, you have the right to object to processing where such processing consists of profiling (including profiling for direct marketing).

In addition to the rights set out above, where we rely on consent as the legal reason for using your personal information, you have the right to withdraw your consent.

If you want to exercise any of the above rights in relation to your personal information, please contact us using the details set out at the beginning of this notice.

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 or 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.

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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Data Commissioner's Office (DCO), Ireland's supervisory authority for data protection issues (<https://www.dataprotection.ie/>).

We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

12. Cookies

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. For more information about the cookies we use, please see our [cookies policy](https://kneevhealth.com/cookies-policy) (kneevhealth.com/cookies-policy)

13. Third-party websites

Our website may contain links to third-party websites. If you click and follow those links, then these will take you to the third-party website. Those third-party websites may collect personal information from you, and you will need to check their privacy notices to understand how your personal information is collected and used by them.