



HUMAN FACTORS AND USABILITY SOLUTIONS

## Legal and Privacy Policy

Auxergo Ltd

12 AUGUST 2020

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## I. Privacy Policy

This policy describes how Auxergo collects, uses, and shares personal information.

### 1. General Privacy Statement

Auxergo Ltd (Auxergo/ We) is (are) are committed to protecting and respecting your privacy and complying with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA 2018). Effective May 25, 2018, the GDPR grants European Union citizens the right to access personal data at any time upon request. It also ensures EU citizens the right to object to Auxergo's use of personal data, and request for data to be removed.

Our privacy policy has been updated to comply with GDPR and applies to all visitors to [www.auxergo.com](http://www.auxergo.com) (our Site) as well as subscribers to our mailing list, regardless of nationality. It explains which data is collected and how it is handled. When you contact us via a fill-in form, any information you choose to disclose is sent directly to us to assist us in better answering your request. Wherever your personal information may be held within Auxergo or on its behalf, we intend to take reasonable and appropriate steps to protect the personal information that you share with us from unauthorised access or disclosure.

This privacy policy does not apply to any third-party websites or pages linked through our site or content.

### 2. How we use your information

This privacy notice tells you what to expect when Auxergo collects personal information. It applies to the information we collect about:

- Visitors to our website
- Visitors to our office
- People taking part in our human factors researches or studies
- Participants we recruit for our clients
- Job applicants
- Clients who use our services and those who subscribe to our marketing information which could include newsletters, events, and our blog.

We may use the information we collect to produce our researches, studies, and projects; to improve this Site; to store your interests in order to customise your visit to this Site; to communicate with you according to your request and preferences; and to compile and analyse trends.

### 3. Visitors to our website

Certain other data may be automatically collected as you navigate our website, [www.auxergo.com](http://www.auxergo.com). The information in the log files include your IP (internet protocol) address and usage details such as Website pages you have visited, files you have downloaded and videos you have watched. Such information helps us to improve our website and allows us to deliver more relevant personalized content to you. The technologies we use for automatic data collection include browser cookies, unless you have disabled or refused to accept them. You may refuse to accept browser cookies. However, doing so will require you to re-enter your personal information on subsequent the Website visits.

For further information please see our cookie policy below.

If you choose to provide us with your postal address or email address and consent to receive marketing material, this information will be stored in our secure contact management system and also added to our third-party provider's secure database to deliver our communications. We will endeavour to ensure that the content that is sent to you is relevant or interesting to you and/or your business.

At any time, you can opt-out of receiving marketing emails by following the clear 'unsubscribe' link at the bottom of each email. At any point you can also ask to be removed from our database by contacting us at [info@auxergo.com](mailto:info@auxergo.com).

Our website includes links to third-party (non-Auxergo) websites, and we are not responsible or liability for the policies or content of such other websites. Auxergo does not track its customers across third-party websites and does not respond to third-party signals. However, some third-party sites such as Google Analytics may track your browsing activities. If you follow a link to any of these websites, please check these policies before you submit any personal data to these websites.

### 4. Visitors to our office

CCTV is used in our office for personal safety and security reasons. The data will be stored for 30 days before being deleted from our servers. Signage is in place to inform visitors that we have CCTV and access to the data is controlled by Auxergo's Facilities Manager.

### 5. People taking part in our human factors researches or studies

Auxergo may collect data of yours for a human factors research or a study, which includes personal data and use-related data. The term "personal data", as used in this privacy policy, refers to any information about you which can be used to personally identify you, such as your name, address, telephone number, e-mail address, or any other personal information you might supply. We also collect the use-related data when you interact with a device, system, interface or environment.

Where Auxergo collects personal data for researches or studies, the information is held securely with restricted access and is not fully shared or partly shared with any other organisation unless prior consent is provided by you.

The data will be retained for the period agreed with our client, which is normally 10 years and then deleted or put beyond use.

## 6. Participants we recruit for our clients

We may collect and process the following data about you:

- a) Information that you provide by filling in paper forms, or electronic forms either on our website [www.auxergo.com/recruitment](http://www.auxergo.com/recruitment) or accessed via an affiliated site [www.docs.google.com/forms](http://www.docs.google.com/forms), or by answering detailed questions to more specifically screen your suitability for a specific study online or offline.

This may include the following:

- Email address and contact details - this data is collected to allow Auxergo to contact individuals.
  - Date of birth and occupation - this information allows the choice of a broad sample of people to come on to a research or study.
  - Details of medical expertise (healthcare professionals or nurses) - this allows the selection of correct healthcare professionals for a given study.
  - Details of medical conditions and medication - this data is used to ensure that only relevant participants are contacted regarding a study, reducing unnecessary communications.
  - Connection to close friends or family who work in a healthcare or market research area - some companies prefer the participant to not have any prior connection with either the area of research or any form of market research as they may already have formed views about the subject, leading to a distortion in the results.
- b) If you contact us, we may keep a record of that correspondence.
  - c) We or a third party engaged by us for the purpose may also ask you to complete surveys that we use for research or study purposes, although you do not have to respond to them.
  - d) We may collect details of your visits to our site including, but not limited to, traffic and location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

Uses made of the information:

Details of your medical conditions or medical expertise will be used to identify your suitability to participate in market research studies undertaken by our clients. Your

email address will also be used to inform you of new studies that you may be interested in participating in. You may also be contacted to ask if you would know of any other individuals that are not registered on our database that may be suitable for any studies.

Disclosure of your information:

We may share your personal data with other organisations in the following circumstances:

- If we are under a duty to disclose or share your personal data to comply with any legal obligation
- In order to enforce or apply our website Terms of Use and other agreements
- To protect the rights, property, or safety of ourselves, our customers, or others

This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We will retain the data on our system for 12 months after which time we will contact you to ask if you are happy to stay registered and ask if any of the information has changed.

## 7. Job applicants

This notice guides our processing of any personal data that is provided by job applicants to Auxergo and you should read it before submitting any of your personal data to us either via our [recruitment@auxergo.com](mailto:recruitment@auxergo.com), other team email addresses, via 3rd party portals (e.g. Cambridge Network) or via post.

Any personal data that you submit to us for the purpose of applying for employment will be used for the purpose of matching you to current or future job vacancies at Auxergo, keeping you informed of relevant future job vacancies at Auxergo, for compiling recruitment statistics or trends information, and for managing our third-party agreements with recruitment suppliers. The personal data would typically include but not be limited to your name, home address, e-mail address, contact mobile/telephone numbers, CV and covering letter, and any other information relevant to your application.

Auxergo will store your personal data securely and only share it within the organisation with those individuals involved in the recruitment process and for the purposes of assessing your suitability for a position with Auxergo. We will only disclose your personal data outside of the organisation if we reasonably believe we are obliged to do so for legal reasons e.g. to HMRC for the purpose of tax collection or in connection with a criminal investigation.

By submitting your personal data, you are consenting to your data being processed within third-party software, including cloud-based packages, on Auxergo's servers and by our staff. Any third-parties will be acting under obligations of confidence and

Auxergo will have conducted due diligence checks on the security measures taken within the software packages to protect your personal data.

We are entitled to hold your personal data for the legitimate purpose of human resource management so if your application to Auxergo is successful and you become an employee your data will be transferred into our personnel system and files.

In the event that your application is unsuccessful we will keep your personal data for 12 months after which time it will be destroyed unless we assess it is in our legitimate interest that you may be suitable for potential future vacancies that become available within Auxergo. The only exception to this rule is where an application made to a specific recruitment campaign that results in an individual becoming a sponsored employee. In this case we defer to the retention period the UK Border Agency advises for keeping candidate information to support a Resident Labour Market Test.

All personal data relating to any individual that has been employed by Auxergo but whose employment has terminated, will be destroyed after 5 years beyond their termination date unless the personal data is of historical value e.g. that of a Founder.

At all stages we will use all reasonable endeavours to ensure your personal data is stored securely and is maintained and up to date. You can contact us at any time to update your personal data or related information, or to ask that we remove your data from our system.

#### 8. Clients who use our services and those who subscribe to our marketing information

Client contact details and those people who subscribe to our marketing activities are stored in our secure CRM system. We use a third-party to manage our marketing communications and marketing lists are copied into their system for this purpose. Only people who have given explicit consent are included on these lists. At any time, people can change their consent preference either by unsubscribing from emails or by contacting any directors at Auxergo.

#### 9. Where we store your personal data

Keeping your data safe is highly important to us.

The data that is collected from you is stored in a secure, encrypted, cloud-based database that uses state of the art SOC 2 certified data servers. The data is protected with encryption both at rest and in transit. The security of this data is monitored continuously.

Any participant sheets are stored using cloud-based Share Point on Office 365. The files are password protected and only accessible by Auxergo employees who have access to the password.

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 site; 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.

You have the right to complain to the Information Commissioner's Office (ICO) if you think there is a problem with the way your data is being handled.

### 10. Subject access requests and right to amendment or erasure

The GDPR gives you the right to access information held about you. You have the right to access a copy of all the information we have on you. You also have the right to object to the way we are processing your data and can ask for data to be corrected and/or removed from the database. You also have the right to restrict the way your data is processed.

Individuals can find out if we hold any of their personal information by making a 'subject access request', in writing to Auxergo FAO Data Protection Officer. If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding it
- Tell you who it has been/could be disclosed to
- Let you have a copy of the information

You may also request that data is amended to keep it up to date or the 'right to erasure', when we will delete any information, we hold on you or put it beyond use, unless a regulatory or legal reason prevents this.

Proof of identification will be required.

### 11. Changes to the Privacy Policy

Auxergo may revise this Privacy Policy from time to time by posting a revised Privacy Policy on our website. Any future changes we make to our Privacy Policy will be posted to our site and, where appropriate, communicated directly by newsletter or email.

## 12. Further information

If you would like further information on our security or data protection, please contact our data protection officer at [DPO@auxergo.com](mailto:DPO@auxergo.com). If you would like to opt out at any time of certain or all contacts from Auxergo please contact us and we will do everything we can to honour such requests.

## II. Cookie Policy

At Auxergo, our website, [www.auxergo.com](http://www.auxergo.com) ("Our Site"), uses cookies and similar technologies in order to distinguish you from other users. Auxergo uses cookies to help us improve our site through audience and usage analytics. It is common for websites to do this every time a user visits in order to recognize repeat visitors, track web traffic, improve search results, and more.

Please read this Cookie Policy carefully and ensure that you understand it. Your acceptance of Our Cookie Policy is deemed to occur if you continue using Our Site. If you do not agree to Our Cookie Policy, please stop using Our Site immediately.

### 1. What is a cookie?

A cookie is a file that is stored on your computer when you visit a website. Most websites use them, and they are generally harmless. When you revisit the website later or visit a different webpage a copy of the cookie file is sent to the website.

They can be used to store information and have many uses, with the most common including tracking, remembering your details or settings, and to keep you logged in to an account.

### 2. When are cookies created?

Writing data to a cookie is usually done when a new webpage is loaded - for example after a 'submit' button is pressed the data handling page would be responsible for storing the values in a cookie. If the user has elected to disable cookies then the right operation will fail, and subsequent sites which rely on the cookie will either have to take a default action, or prompt the user to re-enter the information that would have been stored in the cookie.

### 3. Why are cookies used?

Cookies are a convenient way to carry information from one session on a website to another, or between sessions on related websites, without having to burden a server machine with massive amounts of data storage. Storing the data on the server without using cookies would also be problematic because it would be difficult to retrieve a particular user's information without requiring a login on each visit to the website.

If there is a large amount of information to store, then a cookie can simply be used as a means to identify a given user so that further related information can be looked up on a server-side database. For example, the first time a user visits a site they may choose a username which is stored in the cookie, and then provide data such as password, name, address, preferred font size, page layout, etc. This information

would all be stored on the database using the username as a key. Subsequently when the site is revisited the server will read the cookie to find the username, and then retrieve all the user's information from the database without it having to be re-entered.

The two main types of cookies are for analytics and functionality.

- **Analytics Cookies:** Analytics cookies help us understand how you use Our Site, for example, how efficiently you are able to navigate around it, and what features you use. These cookies enable us to gather this information, helping us to improve Our Site and your experience of it.
- **Functionality Cookies:** Functionality cookies enable us to provide additional functions to you on Our Site such as personalisation and remembering your saved preferences.

#### 4. Strictly necessary cookies

Cookies we use are essential to enable you to move around the Website and use its features, such as accessing secure areas of the Website. Without these cookies, our website Will not work properly.

#### 5. Performance cookies

Cookies we use collect information about how you use our websites, for instance, which pages you go to most often and if you get error messages from those pages. We only use these cookies to improve how our websites work.

#### 6. Functionality cookies

Cookies we use allow us to remember the choices you make (such as your username) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of our web pages that you can customise. They may also be used to provide services you have requested such as watching a video or commenting.

#### 7. Advertising or tracking cookies

The cookies show us where you saw the advert; help us measure the effectiveness of our advertising campaigns; and limit the number of times you see an advert.

## 8. Third party cookies on your pages

As our website uses a content management system and added third-party plug-ins it can sometimes be difficult for us to notice every single cookie being used, especially after software updates. If you do notice a cookie that slips past us or have a question about cookies, then please contact us.

Please note that during or after your visits to our website you may notice some cookies that are not related to us. When you visit a page with content embedded from one of our affiliate partners, you may be presented with cookies from these websites. We do not control the dissemination of these cookies. You must check the third-party websites for more information about these.

There are also some essential cookies which are required for the Website to work; these can only be blocked by changing your browser settings.

## 9. Refusing to accept cookies

Internet browsers normally accept cookies by default. You can change these settings if you wish. Do not track is an up-and-coming feature in web browsers which allows you to tell websites that you do not want to be tracked. However please be aware that this is not generally a per-site setting and will prevent all websites from using cookies, not just ours.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

### III. Data Protection Policy

Auxergo Ltd (/Auxergo/ we) complies with the EU General Data Protection Regulation 2018 (GDPR) and the UK Data Protection Act 2018 (DPA2018) in ensuring the confidentiality of data and ensures that all personal data about participants will be stored securely.

All of our data is stored in accordance with the GDPR 2018 and DPA 2018, and we have a Data Protection Officer ensuring our processes are followed and up-to-date.

Our Information Commissioner's Office (ICO) registration number is ZA493496.

#### 1. General policy statement

Auxergo needs to collect personal information about its study participants, employees and individuals who work on its behalf in order to carry out its business and provide its services.

For study participants, personal data will be stored safely and confidentially by Auxergo and only passed to our clients, such as medical device companies, pharmaceutical companies, market research agencies, medical consultancies and universities and institution for the purposes of a study or a research, as agreed with the participant. All study participants are asked to complete a consent form, ethical statement, and participant information sheet before their agreement for personal data to be collected and stored securely by Auxergo for the purpose of a project.

The lawful and proper treatment of personal information by Auxergo is extremely important to the success of its business and in order to maintain the confidence of study participants, employees and individuals who work on its behalf. Auxergo aims to treat all personal information lawfully and correctly.

#### 2. Definitions

**Processing of information:** How information is held and managed.

**Information Commissioner:** Formerly known as the Data Protection Commissioner.

**Data Subject:** Used to denote an individual about whom data is held.

**Data Controller:** Used to denote the entity with overall responsibility for data collection and management. Auxergo is the Data Controller for the purposes of the Act.

**Personal data:** Any information which enables a person to be identified.

### 3. Rights of individuals

The GDPR 2018 and DPA 2018 set out rules and controls on the collection and processing of personal data. Personal data is any information that can directly or indirectly identify a natural person. It applies to paper records as well as those held in electronic form or another format. The GDPR gives individuals certain rights. Under the GDPR/DPA 2018 an individual has the following rights:

- 1) The right to access the personal information that an organisation holds about them. Accessing personal data in this way is known as making a Subject Access Request
- 2) The right to correct inaccurate personal data
- 3) The right in certain cases to have personal data erased and to prevent processing in specific circumstances:
  - Where data is no longer necessary in relation to the purpose for which it was originally collected
  - When an individual withdraws consent
  - When an individual object to the processing and there is no overriding legitimate interest for continuing the processing
  - Personal data was unlawfully processed
- 4) The right to object to or restrict the way their data is processed
  - Where processing is restricted, Auxergo is permitted to store the personal data but not further process it. Auxergo can retain just enough information about the individual to ensure that the restriction is respected in the future.
- 5) The right to move their personal data from one provider to another (data portability)
- 6) The right not to be subject to automated profiling.

### 4. Data protection principles

The GDPR also imposes obligations on those who record and use personal information to be open about how that information is used and requires them to follow the eight data protection principles. The principles are:

- 1) Personal data shall be processed fairly and lawfully and in a transparent manner.
  - There must be a good reason for collecting the data.
  - The use of data must not upset the individual in any way.
  - This Policy shall be reviewed at least annually.

- 2) Personal data shall be obtained only for one or more specified and lawful purposes and to ensure that such data is not processed in a manner that is incompatible with the purpose or purposes for which it was obtained.
  - They are asked to complete a consent form and ethics form before a research or a study.
  - We are clear about the exact data we have collected in a participant information sheet.
  - We also explain the purpose, use of the data, and other information of a research or study to you.
  
- 3) Personal data shall be adequate, relevant and not excessive for the purpose or purposes for which it is held.
  - We make sure we have enough data but not an excessive amount. We also explain the purpose of the data we collect.
  
- 4) Personal data shall be accurate and, where necessary, kept up-to-date.
  - Data should be accurate as it is coming directly from the individual.
  - Each year we check that data is still relevant and correct.
  - Data that is no longer accurate or relevant is deleted.
  
- 5) Personal data shall not be kept for longer than is necessary for that purpose or those purposes for which it was obtained.
  - We ensure that what data should/must be retained for how long and why.
  - Records will be deleted when an individual asks to be removed from our database or if the individual has died.
  - We will check annually that the participants wish to remain on our database.
  
- 6) Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
  - We have appropriate security to prevent the personal data we hold being accidentally or deliberately compromised.
  - Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
  - When personal data is deleted this should be done safely such that the data is irrecoverable.
  - Appropriate back-up and disaster recovery solutions shall be in place.
  
- 7) Personal data shall not be transferred to a country or territory outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

- The EEA is all countries in the EU plus Norway, Iceland and Liechtenstein.

## 5. Responsibilities of data controllers and processors under GDPR 2018 and DPA 2018

The GDPR imposes certain responsibilities on all those who control and process personal data at Auxergo. These obligations include:

- Holding and using data in a secure manner
- Ensuring that data is handled in line with what individuals have been told and consented to and that this consent is explicit
- Having appropriate arrangements in place for the access to (and sharing of) data and making sure that individuals' data is accurate and retained for a suitable period.

## 6. What data we hold

Auxergo may collect data of yours for a research or study, which includes personal data and use-related data. The term “personal data”, as used in this Policy, refers to any information about you which can be used to personally identify you, such as your name, address, telephone number, e-mail address, date of birth, private and confidential information, and sensitive information including medical history.

We also collect the use-related data when you interact with a device, system, interface or environment. This information may be collected, recorded and used (e.g. on a computer or on paper) and must be dealt with properly to ensure compliance with the GDPR/DPA 2018.

We may also hold data of a research or a study including video recordings, audio recordings, transcripts, photographs, email addresses of clients and business associates, bank details of business associates, and those who we have a financial liability.

## 7. Obtaining consent

Consent is obtained in several ways depending on the nature of a research or study, and consent must be recorded on or maintained with the case records:

- Face-to-face – Written consent will be sought and noted.
- Written - Written consent will be sought and noted.
- Telephone - Verbal consent will be sought and noted on the case record. The verbal consent is to be recorded in the appropriate fields on the computer

record or stated in the email for future reference. Although written consent is the optimum, verbal consent is the minimum requirement.

- Email - The initial response will seek consent.

Specific consent for use of any photographs and/or videos taken will be obtained in writing. Such media could be used for, but not limited to, publicity material, press releases, social media, and website. Consent will also indicate whether agreement has been given to their name being published in any associated publicity. If the subject is less than 18 years of age, then parental or guardian consent will be sought.

## 8. Use of computers

Where computers are networked, access to personal and special categories of personal information is restricted by password to Auxergo authorised personnel only.

Computer monitors in the reception area, or other public areas, are positioned in such a way so that passers-by cannot see what is being displayed. If this is not possible, then privacy screens will be used on the monitor to afford this level of protection. If working in a public area, e.g. reception, we always lock our computers when leaving it unattended.

Firewalls and virus protection to be employed at all times to reduce the possibility of hackers accessing our system and thereby obtaining access to confidential records.

Documents of Auxergo only are stored on the server or cloud-based systems and not on individual computers.

Where computers or other mobile devices are taken for use off the premises the device must be password protected.

## 9. Use of emails

When Auxergo is sending emails to outside organisations, we take care to ensure that any identifying data or personal information are removed. Confidential or special categories of personal information will be written in a separate document which will be password protected before sending. Wherever possible, we watermark the document "confidential".

## 10. Use of fields, books and paper records

In order to prevent unauthorised access or accidental loss or damage to personal information, it is important that care is taken to protect personal data. Auxergo keeps paper records in locked cabinets or drawers overnight and we take care that

personal and special categories of personal information is not left unattended and in clear view during the working the day.

If Auxergo is carrying documents relating to a number of participants when on a series of home visits, we always keep the documents for other participants locked out of sight in the boot of the car (not on the front seat) and not take them into their home. When we carry paper files or documents, we keep them in a locked briefcase or in a folder or bag which can be securely closed or zipped up. The briefcase, folder or bag contains Auxergo's contact details. We never take more personal data with us than is necessary for the job in hand. We always take care to ensure that we leave a participant's home with the correct number of documents and that we have not inadvertently left something behind.

### 11. Disposal of scrap paper, printing or photocopying overruns

Be aware that personal information and other information written on scrap paper are also considered to be confidential. Auxergo does not keep or use any scrap paper that contains personal information but ensure that it is shredded.

If we are transferring papers from our home, or our participants' homes, to the office for shredding this will be done as soon as possible and not left in a car for a period of time. When transporting documents, they will be carried out of sight in the boot of our car.

### 12. Disclosure of information

We may share personal data with other organisations in the following circumstances:

- If we are under a duty to disclose or share your personal data to comply with any legal obligation
- To protect the rights, property, or safety of ourselves, our customers, or others
- In the legitimate interest of conducting a research or a study. We conduct research on behalf of other companies. All participants in a research or a study will have the nature of study explained to them and be given a copy of the study information. Each individual study is different, and the nature of each study will be explained prior to commencement. However, in general it is reasonable to expect that the study sponsor will be given anonymised copies of the video research
- Sponsor companies will be required to comply with GDPR. Should sponsor companies fail to do so, or we are not satisfied with their data handling procedures, we will not disclose personal information to them

### 13. What to do if there is a breach

If a data breach occurs (e.g. personal data held by the Auxergo is lost, stolen, inadvertently disclosed to an external party, or accidentally published), this will be dealt with by our Data Protection Officer to prevent a reoccurrence. The Managing Director of Auxergo should be informed of the breach, action taken and outcomes to determine whether it needs to be reported to the Board of Trustees and also for reporting to the ICO. There is a time limit for reporting breaches to ICO so the Data Protection Officer should be informed without delay.

Any deliberate or reckless breach of this Data Protection Policy by an employee or volunteer may result in disciplinary action which may result in dismissal.

### 14. Roles and responsibilities of Auxergo

Auxergo will ensure there is a Data Protection Officer with overall responsibility for data protection. We will:

- Provide training for all staff members who handle personal information
- Ensure staff understand cyber security threats
- Ensure that software and paperwork are up to date
- Ensure that security software is in place and up to date
- Ensure that our privacy policy, data protection policy and employee handbook are up to date
- Perform regular checks to monitor and assess new processing of personal data
- Develop, maintain and enforce GDPR and DPA policies and procedures

### 15. Roles and responsibilities of Auxergo employees

All Auxergo employees and individuals working on behalf of Auxergo will:

- Observe all forms of guidance, codes of practice and procedures about the collection, analysis, and use of personal information
- Understand fully the purposes for which the Auxergo uses personal information
- Collect and process appropriate information, and only in accordance with the purposes for which it is to be used by Auxergo to meet its service needs or legal requirements
- Ensure information is recorded correctly
- Ensure information is destroyed (in accordance with the provisions of GDPR) when it is no longer required or at such point a participant requests their data is removed (if this is sooner)
- Understand that breaches of this Policy may result in disciplinary action, including dismissal

#### 16. Changes to the Data Protection Policy

Auxergo may revise this Data Protection Policy from time to time by posting a revised Data Protection Policy on our website. Any future changes we make to our Data Protection Policy will be posted to our site and, where appropriate, communicated directly by newsletter or email.

#### 17. Further information

If you would like further information on our security or data protection, please contact our data protection officer at [DPO@auxergo.com](mailto:DPO@auxergo.com).

## IV. Terms of Use

Welcome to the website of Auxergo Ltd. (Auxergo/ We). These Terms of Use govern your access and use of [www.auxergo.com](http://www.auxergo.com) and other websites published by Auxergo, and all content therein (collectively, the "Website").

### 1. Acceptance of the Terms of Use

By accessing this website, you agree to be bound by these Terms of Use ("Terms").

Auxergo may revise and update these Terms from time to time, and any changes are effective immediately upon publication.

### 2. Permitted and prohibited uses

The Website may be used for general informational purposes by current or prospective clients of Auxergo in connection with a contemplated engagement of Auxergo (which engagement would be subject to separate terms). The Website also may be used for limited non-commercial uses, for academic purposes, or as may be additionally permitted in writing by an officer of Auxergo. If you wish to request permission to use any material on the Website for any additional purpose or are not sure whether your intended use of content is permitted, please contact us. In connection with the permitted uses, you may download a reasonable number of files made available for download on the Website.

You may not:

- distribute or reproduce content on this Website except as provided above;
- publish, sell, or modify any Website content;
- use any content on the Website for the benefit of any commercial enterprise or individual that offers services in any of the same areas as Auxergo, or for any other purpose that may be adverse to Auxergo;
- delete or alter any copyright, trademark, or other proprietary rights notices from copies of materials from this Website;
- delete, crop, or otherwise modify the Auxergo logo or name from copies of any materials from the Website;
- copy or record any content on the Website using automated programs, bots, software, or any other method of "scraping" content;
- use any "Pinger," bots, or automated link checker tool to communicate with the Website;
- alter or interfere with the Website's code or the front-end appearance of the Website;
- take any action that imposes an unreasonable or disproportionately large load on the Website or related infrastructure;

- obtain or attempt to obtain unauthorized access to any of Auxergo's networks, through any means;
- submit spam inquiries to our website contact forms, or
- use the Website or any content herein for any purposes that are or may be harmful, infringing, defamatory, obscene, or illegal.

External reproduction of Auxergo content in any form is forbidden without Auxergo's express written permission. External promotion and usage cover sublicensing, leasing, selling, or offering for sale IDC content, as well as any public display, including but not limited to:

- Advertising
- Press releases or media alerts
- Promotional materials and collateral
- Websites, bulletin board postings, and online services
- External presentations

### 3. Intellectual Property rights

The Website and its entire contents, features, and functionality (including but not limited to the Auxergo name, the Auxergo logo, all information, text, displays, images, graphics, video and audio presentations, reports, blogs, guides, charts, white papers, and their design and arrangement), are owned by Auxergo or its licensors, and are protected by international copyright, trademark, trade secret and other intellectual property or proprietary rights laws. All such rights are reserved.

You must not modify the paper or digital copies of any materials you have printed off or downloaded in any way, and you must not use any illustrations, photographs, video or audio sequences or any graphics separately from any accompanying text.

Our status (and that of any identified contributors) as the authors of material on our site must always be acknowledged.

You must not use any part of the materials on our site for commercial purposes without obtaining a licence to do so from us or our licensors.

If you print off, copy or download any part of our site in breach of these terms of use, your right to use our site will cease immediately and you must, at our option, return or destroy any copies of the materials you have made.

Your use of this website and downloads from it, and the Terms of Use, shall be governed in accordance with the laws of England and Wales, and subject to the exclusive jurisdiction of the courts of England and Wales.

### 4. Trade mark

"Auxergo" is a UK registered trade mark of Auxergo Ltd.

## 5. Reliance on information posted

Commentary and other materials posted on the Website are not intended to amount to advice on which reliance should be placed. Auxergo therefore disclaim all liability and responsibility arising from any reliance placed on such materials by any visitor to our website, or by anyone who may be informed of any of its contents.

## 6. Viruses, hacking and other offences

You must not misuse the Website by knowingly introducing viruses, trojans, worms, logic bombs or other material which is malicious or technologically harmful. You must not attempt to gain unauthorised access to the Website, the server on which the Website is stored, or any server, computer or database connected to the Website. You must not attack the Website via a denial-of-service attack or a distributed denial-of service attack.

By breaching this provision, you would commit a criminal offence under the Computer Misuse Act 1990. We will report any such breach to the relevant law enforcement authorities, and we will co-operate with those authorities by disclosing your identity to them. In the event of such a breach, your right to use our site will cease immediately.

We will not be liable for any loss or damage caused by a distributed denial-of-service attack, viruses or other technologically harmful material that may infect your computer equipment, computer programs, data or other proprietary material due to your use of our site or to your downloading of any material posted on it, or on any website linked to it.

## 7. Linking to the Website

We welcome links to the Website, provided that any link is presented in a way that is fair, legal, and does not damage or take advantage of Auxergo's reputation. You may not present a link in such a way as to suggest any form of formal association with Auxergo or any approval or endorsement by Auxergo without written permission to do so.

You must not establish a link from any website that is not owned by you.

The Website must not be framed on any other site, nor may you create a link to any part of our site other than the home page. We reserve the right to withdraw linking permission without notice.

Auxergo encourages its clients to use our data and market intelligence for internal information and communications purposes. The use of graphics and the quotation of individual sentences and paragraphs in your company's internal documents and

communications does not require permission from Auxergo, but it must provide the following attribution, "Source: Auxergo." The use of large portions or the reproduction of Auxergo documents in their entirety requires prior written approval and may involve some financial consideration.

If you wish to make any use of material on the Website other than that set out above, please address your request to [info@auxergo.com](mailto:info@auxergo.com).

## 8. Links from the Website

For the convenience of our users, some Auxergo/Insights Web pages may provide links to other Internet sites. Auxergo does not endorse, warrant, or guarantee the products, services, or information described or offered, and is not responsible for the availability or content of these sites. Further, users cannot assume that the external sites will abide by the same Privacy Policy to which Auxergo adheres. Users should therefore review the external site's privacy policy to learn how information provided to the external site may be used and/or shared.

## 9. Disclaimers and limitations

Your use of the Website and its contents, and any reliance you place on the Website or its contents, is at your own risk. The Website does not constitute the provision of professional advice or services, and should not be used as a substitute for obtaining such services.

The information contained in this website is intended for general information purposes only. Auxergo has made all reasonable efforts to ensure that the information on this website is accurate at the time of inclusion.

Auxergo does not warrant the accuracy, completeness, functionality, or availability of the Website or any of its contents. Auxergo disclaims and you waive any liability by Auxergo or its representatives for (i) any reliance on the Website or its contents, (ii) any loss or damage caused by a Distributed Denial of Service (DDoS) attack, viruses, or other technologically harmful material that may infect your computer equipment, computer programs, data, or other materials due to your use of this Website or of any third party content available or linked to herein, or (iii) any loss or breach of any personal information transmitted through the Website.

***In no event will Auxergo or its representatives be liable for damages of any kind, under any legal theory (including but not limited to claims of reliance or negligence), arising out of or in any way related to the use of the Website or its contents.***

## 10. Jurisdiction and applicable law

The English courts will have exclusive jurisdiction over any claim arising from, or related to, a visit to our site although we retain the right to bring proceedings against you for breach of these conditions in your country of residence or any other relevant country.

These terms of use and any dispute or claim arising out of or in connection with them or their subject matter or formation (including non-contractual disputes or claims) shall be governed by and construed in accordance with the law of England and Wales.

Any failure by Auxergo to assert a right or provision under these Terms of Use shall not constitute a general waiver of such right or provision.

If a tribunal of competent jurisdiction finds any provision of these Terms of Use invalid or unenforceable, such provision shall be reformed to the minimal extent necessary to preserve its intent and render it valid and enforceable, and if reformation is not practicable, the invalid provision shall be severed, and the balance of the Terms of Use shall remain enforceable to the full extent permitted by law.

## 11. Written permission

If you wish to quote Auxergo in an advertising, press release, or other promotional material, contact Auxergo. Please provide a sample documenting the intended use of the information via email to [info@auxergo.com](mailto:info@auxergo.com). This will enable Auxergo to ensure accuracy, currency, and proper context.

## 12. Citation Policy

When using Auxergo content or data, you must provide the following attribution, "Source: Auxergo."

## 13. Your concerns

If you have any concerns about material which appears on our site, please contact [info@auxergo.com](mailto:info@auxergo.com).

## V. Modern Slavery Act: Our Statement

Auxergo is a human factors and usability engineering consultancy. Almost all of our staff are based in the UK and China, and are engaged in consultancy, technology innovation and design, and manufacturing. Our principal supply chains comprise suppliers of healthcare scientific and engineering products, suppliers of office products, sub-contractors for design services and providers of support services. In the board's opinion the risk of modern-day slavery and human trafficking in our supply chains is low.

This statement is made by Auxergo on behalf of itself and its subsidiaries pursuant to section 54(1) of the Modern Slavery Act 2015.

*Xinyi Pritchard Chairman and managing director of Auxergo, Feb 2019*

## VI. Registered Office

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