MedTRiM Privacy Notice

Effective Date: 14th September 2018 Notice Version: 1.0

Data Controller Contact Information
DNA TRiM
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This document governs the privacy notice of our mobile app. Our privacy notice tells you what personal data (PD) and non-personal data (NPD) we may collect from you, how we collect it, how we protect it, how we may share it, how you can access and change it, and how you can limit our sharing of it. Our privacy notice also explains certain legal rights that you have with respect to your personal data. Any capitalized terms not defined herein will have the same meaning as where they are defined elsewhere on our mobile app.

Your Rights
When using our mobile app, and submitting personal data to us, you may have certain rights under the General Data Protection Regulation (GDPR) and other laws. Depending on the legal basis for processing your personal data, you may have some or all of the following rights:

The right to be informed
You have the right to be informed about the personal data we collect from you, and how we process it.

The right of access
You have the right to get confirmation that your personal data is being processed and have the ability to access your personal data.

The right to rectification
You have the right to have your personal data corrected if it is inaccurate or incomplete.

The right to erasure (right to be forgotten)
You have the right to request the removal or deletion of your personal data if there is no compelling reason for us to continue processing it.

The right to restrict processing
You have a right to ‘block’ or restrict the processing of your personal data. When your personal
data is restricted, we are permitted to store your data, but not to process it further.

**The right to data portability**
You have the right to request and get your personal data that you provided to us and use it for your own purposes. We will provide your data to you within 30 days of your request. To request your personal data, please contact us using the information at the top of this privacy notice.

**The right to object**
You have the right to object to us processing your personal data for the following reasons:

- Processing was based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- Direct marketing (including profiling); and
- Processing for purposes of scientific/historical research and statistics.
- Rights in relation to automated decision-making and profiling.

**Automated individual decision-making and profiling**
You will have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

**Filing a Complaint with Authorities**
You have the right to file a complaint with supervisory authorities if your information has not been processed in compliance with the General Data Protection Regulation. If the supervisory authorities fail to address your complaint properly, you may have the right to a judicial remedy.

For details about your rights under the law, visit [https://goo.gl/F41vAV](https://goo.gl/F41vAV)

**Definitions**
‘Non-personal data’ (NPD) is information that is in no way personally identifiable. ‘Personal data’ (PD) means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. PD is in many ways the same as Personally Identifiable Information (PII). However, PD is broader in scope and covers more data.

A “member” or “user” is someone who has registered to download our mobile app and use our Services or buy our products.
Topics Covered in Our Privacy Notice

Information We Collect
Our Use of Cookies
How Your Information Is Used
Retaining and Destroying Your PD
Updating Your PD
Revoking Your Consent for Using Your PD
Protecting the Privacy Rights of Third Parties
Do Not Track Settings
Links to Other Websites
Protecting Children’s Privacy
Our Email Policy
Our Security Policy
Transferring Personal Data from the European Union
Changes to Our Privacy Notice

Information We Collect
Generally, you control the amount and type of information that you provide to us when using our mobile app.

Our Legal Basis for Collecting and Processing Your Personal Data (PD)

Our legal basis for collecting and processing your personal data (PD) is based on and the necessity for the performance of a contract, namely you have completed the necessary course and were supplied with the unlock details.

What Happens if you Don’t Give Us Your Personal Data (PD)
If you do not provide us with enough PD, we may not be able to provide you with all the features of our mobile app.

We collect your PD in the following ways:

At Practitioner and Strategic Leader Login
When you login as a Practitioner or Strategic Leader, we collect your name, course number, and other information listed. Your PD is also stored on your device at this point, to prevent the necessity of repeated logins, each time the app is used.

Our Use of Cookies
Our mobile app does not use cookies.
**How Your Information Is Used**

We use the information we receive from you to:

- To confirm your preferences.

**Communications**

When we communicate with you about our mobile app, we will use the email address you provided when you registered as a member or user. We may also send you emails with promotional information about our mobile app or offers from us or our affiliates unless you have opted out of receiving such information. You can change your contact preferences at any time through your account or by sending us an email with your request to: info@dnatrim.com

**Sharing Information with Affiliates and Other Third Parties**

We do not sell or rent your PD to third parties for marketing purposes. However, your preferences may be shared with your Strategic Leader within the bounds of availability to conduct assessments for which you have received training, during your course.

**Legally Required Releases of Information**

We may be legally required to disclose your PD if such disclosure is (a) required by subpoena, law, or another legal process; (b) necessary to assist law enforcement officials or government enforcement agencies; (c) necessary to investigate violations of or otherwise enforce our Legal Terms; (d) necessary to protect us from legal action or claims from third parties, including you and/or other users or members; or (e) necessary to protect the legal rights, personal/real property, or personal safety of our company, users, employees, and affiliates.

**Disclosures to Successors**

If our business is sold or merges in whole or in part with another business that would become responsible for providing the mobile app to you, we retain the right to transfer your PD to the new business. The new business would retain the right to use your PD according to the terms of this privacy notice as well as to any changes to this privacy notice as instituted by the new business. We also retain the right to transfer your PD if our company files for bankruptcy and some or all of our assets are sold to another individual or business.

**Community Discussion Boards**

Our mobile app does not offer the ability for users to communicate with each other through online community discussion boards or other mechanisms.

**Retaining and Destroying Your (PD)**

We retain information that we collect from you (including your PD) only for as long as we need it for legal, business, or tax purposes. Your information may be retained in electronic form, paper form, or a combination of both. When your information is no longer needed, we will destroy, delete, or erase it.
Updating Your (PD)
You can update your PD, specifically your current preferences using services found on our mobile app. If no such services exist, you can contact us using the contact information found at the top of this notice and we will help you. However, we may keep your PD as needed to enforce our agreements and to comply with any legal obligations.

Revoking Your Consent for Using Your PD
You have the right to revoke your consent for us to use your PD at any time. Such an opt out will not affect disclosures otherwise permitted by law including but not limited to: (i) disclosures to affiliates and business partners, (ii) disclosures to third-party service providers that provide certain services for our business, such as credit card processing, computer system services, shipping, data management services, (iii) disclosures to third parties as necessary to fulfill your requests, (iv) disclosures to governmental agencies or law enforcement departments, or as otherwise required to be made under applicable law, (v) previously completed disclosures to third parties, or (vi) disclosures to third parties in connection with subsequent contests or promotions you may choose to enter, or third-party offers you may choose to accept. If you want to revoke your consent for us to use your PD, send us an email with your request to: info@dnatrim.com

Do Not Track Settings
Some web browsers have settings that enable you to request that we do not track your movement within our mobile app. Our mobile app does not obey such settings when transmitted to and detected by our mobile app. You can turn off tracking features and other security settings in your browser by referring to your browser’s user manual.

Links to Other Websites
Our mobile app may contain links to other websites. These websites are not under our control and are not subject to our privacy notice. These websites will likely have their own privacy notices. We have no responsibility for these websites and we provide links to these websites solely for your convenience. You acknowledge that your use of and access to these websites are solely at your risk. It is your responsibility to check the privacy notices of these websites to see how they treat your PD.

Protecting Children’s Privacy
Even though our mobile app is not designed for use by anyone under the age of 16 (child), we realize that a child under the age of 16 may attempt to access our mobile app. We do not knowingly collect PD from children under the age of 16. If you are a parent or guardian and believe that your child is using our mobile app, please contact us. Before we remove any information, we may ask for proof of identification to prevent malicious removal of account information. If we discover that a child is accessing our mobile app, we will delete his/her information within a reasonable period of time. You acknowledge that we do not verify the age of our users nor do we have any liability to do so.
**Our Email Policy**
We do not hold details of your email address with relation to this App and will only contact you in response to an email from you or your delegated representative.

**Our Security Policy**
We have built our mobile app using industry-standard security measures and authentication tools to protect the security of your PD. We also maintain technical and physical safeguards to protect your PD.

**Transferring Personal Data from the European Union**
(PD) that we collect from you may be stored, processed, and transferred between any of the countries in which we operate, specifically the United Kingdom. The European Union has not found the United States and some other countries to have an adequate level of protection of PD under Article 45 of the GDPR. Our company relies on derogations for specific situations as defined in Article 49 of the GDPR. For European Union customers and users, with your consent, your PD may be transferred outside the European Union to the United States and other countries. We will use your PD to provide information you request from us to perform a contract with you or to satisfy a legitimate interest of our company in a manner that does not outweigh your freedoms and rights. Wherever we transfer, process or store your PD, we will take reasonable steps to protect it. We will use the information we collect from you in accordance with our privacy notice. By using our mobile app you agree to the transfers of your PD described within this section.

**Changes to Our Privacy Notice**
We reserve the right to change this privacy notice at any time. If our company decides to change this privacy notice, we will post those changes on our mobile app so that our users and customers are always aware of what information we collect, use, and disclose. If at any time, we decide to disclose or use your PD in a method different from that specified at the time it was collected, we will provide advance notice by email (sent to the email address on file in your account). Otherwise, we will use and disclose our users’ and customers’ PD in agreement with the privacy notice in effect when the information was collected. In all cases, your continued use of our mobile app, services, and products after any change to this privacy notice will constitute your acceptance of such change.

**Questions About Our Privacy Notice**
If you have any questions about our privacy notice, please contact us using the information at the top of this privacy notice.