	Document Number	LD-04	Title	Eyoto Privacy Notice
Department	Organisation	Revision		1
Owner	Simon Collingridge	Initial Date		20/02/2023
Approval	Alex Bamford	Updated Date		13/08/2024

EYOTO™ GROUP PRIVACY NOTICE

This privacy notice (**notice**) explains how we, the EYOTO™ group, comprised of the entities listed in the schedule at the end of this notice (**we, us, our**) process your personal data if you access or use our website, online content or features, use our devices, software or services or otherwise engage with us online or offline.

This notice applies across all our regions. However, individuals in the United Kingdom (**UK**) should also read the "**For UK Individuals**" section.

If you have any question about your data protection rights or if you do not understand anything explained in this notice, please contact us by email to support@eyoto.com.

1. WHO DOES THIS PRIVACY NOTICE APPLY TO?

This notice applies to:

- users of our website, online content and features;
- our customers and their personnel who use our devices, software or services (e.g., a medical practitioner, technician, customer staff);
- our suppliers and business partners;
- job applicants; and
- anyone else who interacts with us, if you call, email or visit us or otherwise engage with us online or offline.

If you are a patient of a medical practitioner who is our customer and you receive a medical assessment involving the use of our device, software or service, please note that any patient personal data we receive is processed on behalf of our customer, who is the entity with control over your personal data. If you wish to exercise your data rights in relation to your patient personal data, please contact your relevant medical practitioner or let us know and we will forward on your query.

2. WHAT TYPES OF PERSONAL DATA DO WE PROCESS?

"**Personal data**" or "**personal information**" means any information that identifies you or relates to you.

Depending on your use of our services or other interaction with us, this may include the details of your enquiry, contact information, engagement information, your profile, service usage and other information. For more information, please see the "categories of personal data" section below.

However, the exact definition of what constitutes personal data in your specific circumstances will vary depending on the relevant laws which apply to you and the relevant Eyoto entity.

3. DATA ACCURACY

We will trust that your personal data is accurate, complete and up to date. We ask that you keep us informed of any changes where possible.

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4. HOW IS YOUR PERSONAL DATA COLLECTED?

We collect your personal data as follows:

- From **you**, when you send us an email, complete the contact form on our website, when you deal with our sales representatives, when you visit our offices or otherwise deal with us.
- From your **user interactions** with our website, online content, feature or communication or our device, software or service, for example, when you open our email, navigate our website, use our device features, access our software, engage us to provide our services or otherwise interact with us and our services.
- From the **public domain**, such as information on social media, the internet, official companies register or other public records.
- From **third parties**, such as recruitment agencies, your referees, your employer, social media platforms and other third parties.

If you provide information about others, please ensure you have their consent to do so or let us know if you do not.

5. WHY DO WE PROCESS YOUR PERSONAL DATA?

This section explains what personal data is necessary for each purpose. We keep our processes and data collection under review and will update this notice should any personal data no longer be necessary for the given purpose.

The "lawful basis" column explains how we comply with a technical legal justification for data processing under UK data protection laws. Please contact us if you have any questions.

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Purpose	Personal data	Lawful basis of processing (UK only)
To assist with your general enquiry	details of enquiry contact information	Necessary for our legitimate interest in responding to enquiries and complying with best practice or, as the case may be, necessary for taking steps prior to entering into a contract .
To onboard our customers.	contact information public information your background information	Necessary for our legitimate interest in knowing our customer and complying with best practice or, as the case may be, necessary for taking steps prior to entering into a contract, the performance of our contract with the customer or our compliance with the law .
To provide our online services including our website, online content and features to you and the general public which may include personalised content and services.	profile information security information technical information usage information	Necessary for our legitimate interest in providing our online services to the public in a relevant and tailored way and complying with best practice, the performance of our contract with you and compliance with our legal obligations . Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services.
To provide our device, software or service and support services to our customer in accordance	patient personal data	Necessary for the performance of our contract with our customer and

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Purpose	Personal data	Lawful basis of processing (UK only)
with our service agreement and customer instructions.		compliance with our legal obligations as their processor .
To manage authorised user access to our device, software or service .	usage information technical information	Necessary for our legitimate interest in managing authorised users' access to our services and compliance with our legal obligations .
To send you service communications about matters relevant to your use of our services and your engagement with us, changes in our terms, surveys and other feedback requests, etc.	contact information usage information user information	Necessary for the performance of our contract with you and our legitimate interest in understanding how our services are used and viewed by our customers and keeping our customers informed.
To manage our professional relationship with you using our record management systems and engagement tools, identifying opportunities, contacting you by phone and sending you marketing communications.	business opportunity information usage information user information	Necessary for our legitimate interest in understanding and maintaining our business relationships and administering our business.
To send you relevant marketing communications including by email, phone and/or text message.	contact information details of enquiry business opportunity information	Our legitimate interest in promoting our organisation and services. You will have the right to opt-out from future marketing communications. Where required by law, we will obtain your consent which you can withdraw at any time.
To display relevant advertisements on websites, apps, social media and other inventory. Our advertising tools rely on cookies, similar scripts and advertising ID solutions and complex automated processes and decision-making.	pseudonymised business opportunity information profile information security information technical information usage information user information	Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services. Some of our marketing and advertising activities are necessary for our legitimate interest in understanding your interests from the information available to us, information observed or inferred and third party information, in promoting our business and understanding campaign metrics. You have the right to opt-out at any time.

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Purpose	Personal data	Lawful basis of processing (UK only)
<p>However, we use pseudonymised information that does not include your name or similar information, except in limited cases where your details such as your email address is needed to identify you on social media for advertising purposes. We rely on your customer profile data to understand your interests and preferences known, observed and inferred to design marketing and advertising campaigns that are relevant to you (also known as “profiling”, “personalisation” and “predictive analytics”), use an ID such as your hashed email address to identify you within third party datasets without actually disclosing your email and allocate your profile to relevant audience segments (also known as “matching”, “data enrichment”, “targeting”) or matching you against our typical customer profile (creating "lookalike audiences"), and measuring conversion events linked to your advertising ID to optimise campaign performance.</p>		
<p>To assess your job application and for business administration purposes.</p> <p>For example, if you apply for a job, we will review your CV, publicly available information about you, information from your previous employers and professional references.</p>	<p>contact information details of enquiry public information special categories of personal data your background information</p>	<p>Necessary for our legitimate interest in considering applications, responding to queries and, as the case may be, necessary for taking steps prior to entering into a contract. Special categories of personal data may be processed as is necessary in the context of employment and social security laws.</p>
<p>To develop and improve our website, online content and features, our devices, software and services and organisation through analytics, engagement monitoring, testing, training of algorithms and similar activities.</p>	<p>pseudonymised profile information security information technical information usage information user information anonymised optometric image and lens measurement data derived from patient data</p>	<p>Necessary for our legitimate interest in analytics and service development.</p> <p>Where required by law, we rely on your consent to deploy cookies or similar technologies on your device or to read information on your device except where necessary for essential services.</p>
<p>To gather market insights and best medical practice data.</p>	<p>pseudonymised usage information</p>	<p>Necessary for our legitimate interest in producing insights for commercial use and research in public interest.</p>

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<p>To ensure the proper administration of our organisation, including to:</p> <ul style="list-style-type: none"> • keep appropriate records; • resolve complaints; • enforce our terms; • debt collection; and • similar purposes. 	all personal data as is necessary and proportionate	Necessary for compliance with our legal obligations , to establish, exercise or defend legal claims and necessary for our legitimate interest in the proper administration of our organisation and services and protecting our reputation.
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Purpose	Personal data	Lawful basis of processing (UK only)
To ensure information security of our information systems, premises, meetings and communications.	security information usage information	Necessary for our legitimate interest in ensuring the security of people, our organisation and assets and compliance with our contractual obligations, and as necessary for compliance with our legal obligations .
To ensure your health and safety at our premises or to make reasonable adjustments on account of your disability.	special categories of personal data	Necessary for our legitimate interest in ensuring health and safety and good accessibility at our premises in the substantial public interest and complying with our legal obligations .
To engage our third party service providers and advisors who may process your personal data on our behalf or otherwise to facilitate the provision of our services and the fulfilment of essential service functions including cloud storage, telecommunications, information security, professional advice and other services.	all personal data as is necessary and proportionate	Necessary for our legitimate interest in providing our services and running our organisation.
To monitor interactions and operations for the prevention and detection of crime including fraud, and to share information with law enforcement authorities and other stakeholders.	all personal data as is necessary and proportionate	Necessary for our legitimate interest in protecting people, our organisation and assets and detecting and preventing crime, and compliance with our legal obligations .
To share data with another organisation in accordance with the law for the purposes of a joint venture, collaboration, merger or acquisition.	all information as is lawful, necessary and proportionate	Necessary for our legitimate interest in engaging in activities to promote and develop our organisation and business and complying with our legal obligations .
Processing and sharing your personal data in connection with legal claims, law enforcement or regulatory requests .	all personal data as is necessary and proportionate	Necessary for compliance with our legal obligations , to establish, exercise or defend legal claims or for our legitimate interest in complying with best practice.

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We may process your personal data for other purposes which are compatible with the existing ones. However, we will obtain your prior consent for any new purpose where required by law.

6. WHO IS YOUR PERSONAL DATA DISCLOSED TO?

We may share your personal data with the following third parties:

- Our service providers, business partners and advisors as required for the proper administration of our organisation and the purposes stated above (including for example, online advertising) or in the context of providing our services.
- Our auditors, legal advisors and similar parties bound by professional secrecy.
- Our customers who use our device, software or service to provide medical treatment to you.
- The public if you interact with us on social media or as required by law.
- Recruitment agent, your former employer or other person providing a reference about you.
- HMRC, the Police, medical standards authority and other authorities as strictly required by law or best practice.
- Third party where ordered by the court or necessary in establishing, exercising or defending legal claims.
- Another organisation in case of a merger, acquisition or collaboration.
- Other third parties where you have provided consent.

7. HOW DO WE SECURE YOUR PERSONAL DATA?

We have put in place appropriate organisational and technical measures to safeguard your personal data that we keep on premise and on our systems.

We seek to ensure our third-party service providers do the same. We only appoint service providers under an appropriate contract who provide sufficient guarantees about data security in accordance with applicable law.

No system is completely secure and we cannot fully guarantee the security of your personal data. We will deal with any personal data breach in accordance with our incident response procedure and will notify you and the regulator where we are legally required to do so.


Our staff undergo training on confidentiality and access to your personal data is restricted on a "need to know" basis.

8. HOW LONG IS YOUR DATA KEPT?

We will retain your personal data for as long as it is necessary for the purposes set out above or longer, as may be required by law, for legal claims or otherwise. By way of example, the following retention periods may apply.

Details of your enquiry	2 years from collection
Business opportunity information	6 years from collection
Job applications	One year from collection
Patient data	Erased without delay upon transmission to customer
Profile data	3 years from collection

After the retention period, your personal data will either be securely deleted or anonymised, and it may be used for analytical purposes.

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9. WHERE WE STORE YOUR PERSONAL DATA

Generally, your personal data will be held in the UK or US, depending on your location. However, your personal data may be transferred between our group companies and their service providers who are involved in providing our services to you.

In these cases, we will satisfy ourselves that your data protection rights are adequately protected by appropriate technical, organisational and contractual safeguards in accordance with the relevant data protection laws before any such transfer.

10. OPT-OUT

If you would like us to stop sending you marketing communications and to process your personal data for direct marketing purposes, please contact us.

You can request to stop receiving our marketing communications at any time by clicking on the unsubscribe link at the bottom of each marketing message and we will add you to a suppression list or otherwise arrange that you no longer receive marketing communications.

11. YOUR RIGHTS

Depending on your rights and our obligations under applicable data protection law, you may contact us to:

- Request **disclosure** of your personal data held by us.
- Request **correction** of any inaccurate or incomplete personal data held by us.
- **Withdraw consent** previously provided to us in respect of your personal data.
- Request **deletion** of your personal data held by us.
- Request **not to sell or share** your personal data with third parties, particularly in the context of behavioural advertising.
- Exercise other data rights which we are bound to comply with.

Please email or call us if you wish to exercise your data rights.

12. THIRD PARTIES MAY PROCESS YOUR PERSONAL DATA

Our website, content and features may involve the use of third party services, social media platforms such as Twitter and Instagram, or other third party services.

We may also share your personal data with third parties, such as payment services providers, public authorities and others who process your personal data for their own purposes.

You should check the privacy statements of these third parties and we are not responsible for how they may process your personal data. Please note some of them may use your personal data for business administration, product development or advertising purposes.

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13. CATEGORIES OF PERSONAL DATA

We process the following categories of personal data about you:

Contact information	including your home or business address, telephone, email and similar information.
Details of enquiry	Details of your enquiry, service request, job application or other communication.
Business opportunity information	Your personal and professional details as business customer and other opportunity records.
Profile information	including your demographic information from our analytics and advertising partners, your preferences and interests known, observed or inferred by using analytics, advertising or other tools and sources including notes of your past interactions with us.
Public information	from public registers, databases, social media, the Internet and similar sources.
Security information	including activity data, network monitoring and logging data, antivirus scan, information in security logs and similar information.
Special categories of personal data	including your race, ethnic origin, religious or philosophical beliefs, sexual orientation, political or trade union affiliation and information about your health.
Technical information	including online identifiers, internet protocol (IP) address, details of operating system, browser type, language, time zone setting, location, date and time of access, local storage data and similar information obtained from your device, browser, an API or similar source.
Usage information	about how you navigate and engage with our website, online content and features including online activity data such as downloads, clickstream data with URLs visited previously, page interaction, such as scrolling, clicks, and mouse-overs, methods used to browse away from our website, email open rates, click rates, view rates, active time spent, 'likes' on social media platforms, such as Instagram or Twitter, and similar information.
User information	including your name, professional role, ID verification information, user credentials and similar information.
Your background information	including your personal, professional and financial information obtained from you, public sources and third parties such as former employers, colleagues or patients and similar information.

14. UPDATES TO THIS NOTICE

If we make any changes to our notice, you will be able to see them on this page, as indicated by the "Last updated" date at the top.

If any such changes significantly affect you, we will ask for your prior consent where we are required to do so by law.

15. FOR UK INDIVIDUALS

A. CONTROLLER

EYOTO Limited will process your personal data as "controller" for the purposes and under the legal grounds of processing set out above.

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However, as noted above, if you are a patient of a medical practitioner who is our customer, and you receive a medical assessment involving the use of our device, software or service, please note that we act as “**processor**” in relation to your patient personal data processed on behalf of our customer who acts as “**controller**” in relation to such data. If you wish to exercise your data rights in relation to your patient personal data, please contact your relevant medical practitioner or let us know and we will forward on your query.

B. PERSONAL DATA

“**Personal data**” 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, in particular 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.

C. YOUR RIGHTS

Subject to certain exemptions, limitations and appropriate proof of identity, each data subject has the following rights in relation to his or her personal data:

- **Right to information** about matters set out in this notice. You may also contact us for further details about our data retention policy, international data transfers and other matters that are unclear.
- **Right to make an access request** to receive a copy of your personal data held by us.
- **Right to rectification** of any inaccurate or incomplete personal data.
- **Right to withdraw consent** previously provided.
- **Right to object to our processing** of personal data based on our legitimate interests.
- **Right to erasure** of personal data that is no longer needed.
- **Restriction on the processing** of personal data.
- **Right to human intervention** in respect of any automated decision-making without human involvement that significantly affected you.
- **Right to data portability** from one service provider to another, where applicable
- **Right to lodge a complaint** with the Information Commissioner’s Office.

All requests will be processed without undue delay and no later than within one month. If we cannot process your request within this period, we shall explain why and process it as soon as possible thereafter.

ENTITIES

EYOTO™ Group Limited	Unit 2, Mill Street, Mill Street, Birmingham, B6 4BS, United Kingdom	Information Commissioner’s Office Register of fee payers number ZB281026
Eyoto Limited	Unit 2, Mill Street, Mill Street, Birmingham, B6 4BS, United Kingdom	N/A

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