

Privacy Statement

Flexicare (Group) Limited (“we”/“us”) are committed to protecting and respecting any personal information you share with us. This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

We will always give you the option not to receive marketing communications from us. We will never send you unsolicited ‘junk’ email or communications, or share your data with anyone else who might. We do not sell your information to third parties.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

This version of our Privacy Statement is live from 25th May 2018.

What information do we collect?

We may collect contact information about you when you engage with our website. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

We collect information about you use our websites, and contact our customer service department or members of our sales teams. Some of this information does not identify you personally, but provides us with information about how you use our products and engage with us (we use this information to improve our services and make them more useful to you). The information we collect includes some or all of the following:

1. Name (including title);
2. Address;
3. Phone number;
4. Date of birth;
5. Email address;
6. Product requests and if provided, reason for these requests;
7. The date and time you used our services;
8. The pages you visited on our website and how long you visited us for;
9. Your IP address;
10. The internet browser and devices you are using;
11. The website address from which you accessed our website;
12. Details of any transactions between you and us or any authorised service provider such as our CRM system.
13. Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses), and company details.
14. Any information within correspondence you send to us.

How do we use this information?

Flexicare (Group) Limited will only process information that is necessary for the purpose for which it has been collected. You will always have the option not to receive marketing communications from us (and you can withdraw your consent or object at any time). We will never send you unsolicited ‘junk’ email or communications, or share your personal information with anyone else who might.

There are various ways in which we may use or process your personal information. We list these below:

Consent

Where you have provided your consent, we may use and process your information to:

1. Contact you from time to time about promotions, events, products, services or information which we think may be of interest to you (don’t worry, we won’t bombard you);

You can withdraw your consent at any time by contacting us on the details provided within the ‘How can I manage the information we hold about you’ section below or, in relation to any marketing messages you receive, by using the unsubscribe option included in those messages.

Contractual performance

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us).

Legitimate interests

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support customers with sales and other enquiries

1. To respond to correspondence you send to us and fulfil the requests you make to us (for example: brochure requests, product sample requests or information about specific products);
2. To provide customer support and services.
3. Processing necessary for us to respond to understanding customers' needs
4. To analyse, evaluate and improve our products and services so that your visit and use of our website, and customer service department are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally);
5. To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services that we think you will be interested in. We will only send marketing communications to you if you have provided your consent for us to do so or which we have obtained in the ways mentioned in the paragraphs above;
6. For product development purposes (for example to improve product quality, performance and safety);
7. To send you marketing information from time to time after you have purchased a product or service from us or made a purchasing enquiry, closed your browser with items in your shopping basket or requested a test drive, brochure or other information of interest. We will only contact you with information about our own products and services (and in ways the law allows), which we hope you will like. You have the right to object to us sending you this information at any time;
8. To contact you from time to time with marketing information (unless you object) if you have expressly indicated to us that you are acting on behalf of a business or where we have obtained your business contact details an online or public business directory. In relation to any such information we send by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing;
9. To contact you with targeted advertising delivered online through Flexicare social media unless you object.
10. To identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information);
11. To administer competitions and promotions that you enter with us from time to time and to distribute prizes;
12. To contact you when we close or moves premises.
13. Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively
14. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer;
15. For network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;
16. To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
17. To inform you of updates to our terms and conditions and policies.

Legal obligation

We may process your personal information to comply with our legal requirements.

Vital interest

Sometimes we will need to process your personal information to contact you if there is an urgent safety or product recall notice and we need to tell you about it.

How do we share this information?

We do not sell your information to third parties, but we do work closely with our authorised provider network and with third party suppliers who fulfil business activities for us (like our CRM system.)

We do not sell your information to third parties. However, we may from time to time disclose your information to the following categories of companies or organisations to which we pass the responsibility to handle services on our behalf: CRM service provider, market research and market analytics service providers, our legal and other professional advisors.

We take steps to ensure that any third-party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated none specific data sets where ever possible.

Due to the international nature of our business, there may be some instances where your information is processed or stored outside of the EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. There are circumstances where we share your information with other companies within our Group in order to fulfil orders, transactions, handle complaints or provide you with a service or information that you have requested.

How long do we keep your information for?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

How can I manage the information we hold about you?

You have the right as an individual to access your personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request (including any identification documents requested).

You have the right to:

1. Ask for a copy of the information that we hold about you;
2. Correct and update your information;
3. Withdraw your consent (where we rely on it).
4. Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
5. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
6. Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

You can exercise the above rights and/or manage your information by contacting us using the details below:

Post: Flexicare (Group) Limited, Cynon Valley Business Park, Mountain Ash, CF45 4ER

Email: enquiries@flexicare.com

Phone: 01443 474647

If you have any specific data protection concerns or a complaint, you can address it to our Data Protection Team at dataprotection@flexicare.com.

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

Post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Email: casework@ico.org.uk

Phone: 0303 123 1113

Privacy Statement for California Residents

In this section references to “We”, “Us”, “Our” refer to Flexicare (Group) Limited and its US located subsidiary Flexicare Incorporated. This section supplements the information set out in our Privacy Statement above and applies to all visitors, users, and others who reside in the State of California (“consumers” or “you”). If you are a California resident, the California Consumer Privacy Act of 2018 (CCPA) may provide you with additional rights regarding the use of your personal information. For the avoidance of doubt terms defined in the CCPA have the same meaning when used in this section.

The CCPA provides California residents with specific rights regarding their personal information. These rights include:

- access to the personal information we process about you;
- the right to request the deletion of your personal information (subject to certain exceptions);
- the right to opt-out from the sale of your personal information (if applicable); and
- the right not be discriminated against for exercising any of your rights.

You can exercise your data privacy rights by emailing inquiries@flexicare.com or contacting us on 949-450-999.

Please note that we may require that you provide evidence of your identity and/or address and that you may only make a request for access or data portability twice within a 12-month period. We will not be able to respond to any requests or provide any personal information if we are unable to verify your identity or authority to make the request.

We may deny your deletion request in certain limited circumstances if retaining the information is necessary for us or our service providers to perform certain actions.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to the maximum permitted under by the CCPA), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding your request (following verification of your identity or authorization rights). The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

No fee is charged to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Do Not Sell My Personal Information

The CCPA provides consumers with the right to opt-out of the sale of their personal information. We do not have any arrangements for the sale of any personal information and confirm that in the preceding 12 months we have not sold personal information that we collected from California residents.

Non-discrimination

We will not discriminate against you for exercising any of your CCPA rights. This means that save where permitted by the CCPA, we will not deny you any goods or services, provide a different level or quality for those goods or services or charge different prices or rates for those goods or services.

Information we collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). Please note that personal information does not include:

- publicly available information from government records;
- deidentified or aggregated consumer information;
- information excluded from the CCPA's scope.

Summary of personal information we have collected

In the preceding 12 months we have collected the following categories of personal information:

| CATEGORY OF PERSONAL INFORMATION (AS DEFINED BY THE CCPA) | | COLLECTED |
|---|--|-----------|
| A | Identifiers Name, username, contact information, Internet Protocol (IP) address, device ID, and similar identifiers | YES |
| B | Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) Name, contract details, identification information, and employment/financial information | YES |
| C | Characteristics of protected classifications under California or federal law Age, gender, status and similar characteristics | YES |
| D | Commercial information Records of personal property, services purchased, obtained or considered, or other purchasing or consuming histories or tendencies | YES |
| E | Biometric information Genetic, physiological, biological and behavioural characteristics or activity patterns from which a template may be extracted such as fingerprints, faceprints, voiceprints etc. | NO |
| F | Internet or other similar network activity Information about how you browse and/or search our website and communicate with us. Cookie information | YES |
| G | Sensory data Audio, electronic, visual, thermal, olfactory, or similar information | YES |
| H | Geolocation data The general location of visitors to our website | YES |
| I | Professional or employment-related information Current or past job history or performance evaluations | YES |
| J | Non-public education information Education records directly related to a student maintained by an educational institution or party acting on its behalf (i.e. grades, transcripts etc.) | YES |
| K | Inferences drawn from other personal information Profile information reflecting personal preferences, characteristics, behavior etc. | YES |

Use of personal information

We may use or disclose personal information we collect for one or more of the purposes set out above under the section entitled ‘How do we use this information?’.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing personal information

As described in our Privacy Statement above, we share your personal information with third parties for business purposes. These service providers are permitted to process your personal information only for the purposes of providing services to us.

Changes to our privacy statement

We reserve the right to amend this Privacy Statement at our discretion and at any time. When we make changes to this Privacy Statement, we will post the updated statement on the Website and update the statement’s effective date. Your continued use of our Website, services and purchase of our goods following the posting of changes constitutes your acceptance of such changes.

Contact information

If you have any questions or comments about this statement, the ways in which Flexicare (Group) Limited and its US located subsidiary Flexicare Incorporated collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

- Phone: 949-450-9999
- Website: www.flexicare.com/en-us/
- Email: inquiries@flexicare.com
- Postal Address: Attn: CCPA Department
Flexicare, Inc., 15281 Barranca, Parkway, Unit D, Irvine, California, 92618.