

PRIVACY NOTICE

H2 Cognitive Designs LTD (H2CD), Privacy Policy

This policy covers all services and apps provided or supported by H2CD, including, but not limited to:

- **Cognitron,**
- **Cognitron.Health (Cognitron Assess),**
- **Cognitron Android and iOS Apps,**
- **Imaginator Android and iOS Apps**
- **CogAssess Android and iOS Apps**

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Our contact details

H2 Cognitive Designs

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User Privacy and Data Protection

At H2 Cognitive Designs LTD. (H2CD), we prioritise protecting and securing our users' personal information. This section outlines our practices regarding collecting, using, sharing, and protecting your data.

- **Location Services:** Our apps request access to location services to enable Bluetooth Low Energy (BLE) communication. It's important to note that we do not collect or store any location data. This permission is solely for facilitating BLE communication within the app.
- **Data Collection and Usage:** We collect various types of information, including email addresses, health and social care data, and cognitive performance data. This information is gathered directly from you for purposes such as participation in research studies or clinical assessments as requested by your clinician (further details are below)
- **Data Security:** We employ state-of-the-art security measures to protect your information, including encryption in transit and at rest. Our practices are designed to secure your data and comply with the highest data protection standards.

The type of personal information we collect

We currently collect and process the following information:

- Email addresses
- Health and social care data
- Cognitive Performance Data
- Ethnicity

- Sex
- Gender
- Website user statistics
- Employee data

How do we get personal information, and why do we have it?

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To undertake cognitive tests and surveys, which form part of a research study
- You have provided this information after your clinician has requested that you complete a set of tasks and/or assessments for use in your clinical care.

We may also receive personal information indirectly from the following sources in the following scenarios:

- From your clinician, who may have requested that you complete assessments using one of our products.

How do we use your personal information?

We use the information you have given us to carry out scientific research and/or to provide reference data to your clinician(s) to assist in your clinical care.

No personally identifiable data (PID) held or otherwise processed by H2CD (including, but not limited to, name, email addresses, voice, or image data) will be transferred to any third party unless:

- We are required to do so by law
- We have a good reason to believe there is a risk of serious harm to you or others.
- We are compelled to do so by a court or tribunal and have a legal basis to do so.
- We have your explicit consent.
- We are acting as a data processor on behalf of a data controller who has asked you to provide this data on a lawful basis. We will return any collected data to them. For instance, if a healthcare or research organisation asks you to complete assessments on Cognitron, the name and contact details of the data controller will be provided to you before you enter the data.

H2CD may use anonymised data for internal research and development, but will never sell any data that could be used to identify and/or contact you to any third party.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You can withdraw your consent at any time. You can do this by contacting helpdesk@h2cd.co.uk

(b) Contract

(c) Legal obligation

Please note that the vast majority of the data held is not personally identifiable by any means or any party. Data provided or stored anonymously or without identifying information cannot be removed at a later date.

How do we store your personal information?

Your information is securely stored and encrypted both at rest and during transport (HTTPS) using modern cryptographic methods and security practices that are compliant with the NHS Data Protection toolkit and exceed the requirements of UK Cyber Essentials.

Access control measures, including password protection and multifactor authentication, protect the data we hold about you.

Unless otherwise specified, we keep email addresses, voice or image data for five years. We will then dispose of your information by deleting any personally identifiable information and any link to any information we may hold.

How do we use your personal information?

Any personally identifiable data (PID) held or otherwise processed by H2CD (including, but not limited to, name, email addresses, voice, or image data) will never be transferred to a third party without your consent. H2CD will never sell PID to a third party.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - In certain circumstances, you have the right to ask us to restrict the processing of your personal information.
- **Your right to object to processing** - You have the right to object to processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or you, in certain circumstances.
- **You are not required to pay any charge for exercising your rights.** If you make a request, we have one month to respond.

Please contact us at helpdesk@h2cd.co.uk if you wish to make a request.

The National Data Opt-Out

Where H2 Cognitive Designs acts on behalf of an NHS Health and Social Care partner, users should know their rights under the national data opt-out.

The national data opt-out was introduced on 25 May 2018, enabling patients to opt out of the use of their data for research or planning purposes. This is in line with the recommendations of the National Data Guardian in the review of data security, consent, and opt-outs.

Patients can view or change their national data opt-out choice at any time by using the online service at www.nhs.uk/your-nhs-data-matters or by clicking on "Your Health" in the NHS App, and selecting "Choose if data from your health records is shared for research and planning"

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at helpdesk@h2cd.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>