

# POLICY

## GDPR Privacy Notice

## Privacy Notice

Please read the following information carefully. This Privacy Notice details what personal data we collect and process and how we shall use it. This Privacy Notice applies to:

- UK and EU Customers and business contacts of MHS
- UK and EU Individuals whose data may be processed when visiting this website.

## About Us

Multi-Health Systems (MHS) is a developer of innovative assessments and solutions. We develop tools for measuring and developing the potential of people. We develop ground-breaking solutions aimed at understanding and addressing neurological conditions and disorders, including ADHD, in both children and adults.

We are located in Canada, the UK and North America, and service clients globally.

MHS holds individual privacy to be of primary importance throughout its business practices and is committed to the confidentiality, availability, and safeguarding of all personal information collected. This Privacy Policy is inclusive to all MHS online platforms, including its commercial website, products, assessment portals, and digital delivery platforms.

Privacy and Data Protection are fundamental human rights, we respect every individual's right to privacy and data protection, and to process their data in a way that is fair and lawful.

## Contact Us

In accordance with the UK/EU data protection law, MHS has appointed a UK/EU Authorised Representative for customers located in the UK/EU. Contact information is as follows: [GDPRRepresentative@mhs.com](mailto:GDPRRepresentative@mhs.com)

## Changes to this Privacy Notice

MHS reserves the right to make changes to its privacy policy. Updates to this policy will be made from time to time to reflect changes consistent with industry best practices, legislation, regulations and the policies of MHS.

## Your Rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data in certain circumstances. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data in certain circumstances, including where we are processing your personal data for direct marketing purposes.

If you want to exercise any of these rights, please contact our UK/EU Authorised Representative: [GDPRRepresentative@mhs.com](mailto:GDPRRepresentative@mhs.com) and this request will be passed on to our Data Protection Officer.

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We may need to refer your individual rights request to the qualified individual or entity whom provided the assessment so as to exercise this right. They may need to confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

## Keeping Your Data Secure

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used/accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data for specified purposes, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## How Long Will We Store Your Personal Data

We maintain retention schedules which define the periods for which we will store your personal data. We will only store personal data for as long as we have a legitimate need to retain it, either for statutory/legal reasons or because we need the data to be able to provide you with services or for other legitimate business needs.

When we no longer need this information, we will anonymise your data and/or dispose of it securely. A copy of our retention schedule is available by request to the DPO.

## Transfer Of Your Information Outside of the United Kingdom and EU

Under the provision of providing assessments, it may be necessary to transfer your personal data outside the UK and EU.

Whenever we transfer your personal data out of the UK/EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- We will put in place appropriate safeguards as set out in the UK and EU GDPR, including the use of International Data Transfer Agreement/Standard Contractual Clauses or other specific contracts approved for use in the EU and UK which give personal data the same protection it has in EU/UK.

Please visit Digital Trust page on our website: <https://mhs.com/digital-trust/> to view and complete the GDPR SCCs if you are a customer who wishes to utilise our assessments or solutions to implement the necessary transfer safeguard mechanism before transferring your data outside of the UK/EU.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/EU to our third party providers. If you would like any further information, please contact us via

[GDPRRepresentative@mhs.com](mailto:GDPRRepresentative@mhs.com)

## Automated decision-making

Automated decision-making is the process of making a decision by automated means without any human involvement. We do not currently process your personal data in this manner.

## The Data We Collect About You

The information MHS receives from customers is used to deliver our products and services. The data collected can include but is not limited to:

- Personal contact information,
- Demographic information,
- Product purchase history
- Information related to your account.

MHS limits the use of this personal information to tasks related only to the service or product requested. Examples where personal information is used also include order processing, completing an assessment and payment activity, etc.

## Special Category Data

Some of our assessment portals may also collect other personal information that you supply to us which according to UK/EU data protection law is considered to be Special Category Data. This may include information relating to your age, gender, race/ethnicity, education, occupation, where relevant in the context of the products or the services provided through digital delivery platforms. When such personal information is submitted, it is only processed for the purposes for which you have submitted it to us. You may choose not to provide certain information, however, your decision not to provide certain information may limit the use of select products and services available to you.

## Website data collection

Our website obtains information that is automatically generated by a user's Internet Service Provider (ISP). This information may include the IP address, domain types, the browser type used to access our site, the location of the ISP's servers, the pages of our site that the user views during the visit, any search terms entered on this site, the website address and email address of a user, and any other information transmitted from the user. This information may be collected for system administration purposes, to gather broad demographic information, to monitor the level of activity on the site, for technical support, and to improve our website by responding to customer interests and needs. MHS does not link IP addresses to personal information.

## Lawful Bases

MHS will only process data where there is a lawful basis to do so, these include:

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the

best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation to which we are subject.
- **Consent** means that you have provided us with a freely given, specific, informed and unambiguous indication of your agreement to the processing of personal data.

## Sharing Your Personal Data

We may share your personal data with the parties set out below:

Third Parties such as:

- suppliers and those who process data on our behalf such as for administration purposes
- those to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Any entity to whom we are legally required or requested to make such disclosure by any court of competent jurisdiction or by any governmental, law enforcement agency or other regulatory authority.

We require all MHS Employees and other third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## How To Make a Complaint

If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the applicable supervisory authority or seek redress through the courts.

The UK supervisory authority is the Information Commissioner's Office who can be contacted by calling 0303 123 1113 or by visiting their website at <https://ico.org.uk/for-the-public>.

If you are located within the European Union, you can find your appropriate data protection supervisory authority details here:

[https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en)