



Policy Document

Privacy

energy5 LIMITED (“We”) are totally committed to protecting and respecting your privacy at all times.

We are energy5 Limited, a company registered with Companies House in England and Wales under number 12331243 whose registered office is at **energy5 Limited, The Point, Granite Way, Mountsorrel, Loughborough LE12 7TZ** (“energy5”/“we”/“us”/“our”).

We provide energy5 devices, which generate 5 natural energies that are proven to enhance wellness and vitality.

By using the energy5 device, or any energy5 website or app, you consent to us processing your personal information in accordance with this Privacy and Cookie Policy (the “Policy”). This is the legal basis upon which we process your personal information as well.

It is necessary for the performance of our obligations under the terms of use/terms and conditions you accept, to use our energy5 device.

You may withdraw such consent at any time by letting us know via email at: contact@energy5.co.uk or by telephone +44 (0) 330 090 4777. At that time, you may also want to remove any cookies which have been placed on any device used to access the websites.

Your withdrawal of consent will not affect the lawfulness of any processing carried out by us prior to such withdrawal.

We want you to obtain the very best personalised experiences at all times in your home, when using the energy5 device. This requires us to collect personal information from you.

However, we want to ensure you are in total control of that personal information.

We always want you to be aware of where and how your personal information is being used. This is of paramount importance to us.



So, let's describe what this Policy tells you. It explains:

- What information we may collect about you
- What we may do with the information we collect about you
- Whether we share your information with anyone else
- The types of cookies we use and how you can reject these cookies
- Where we store your information
- How we keep your information secure
- Your rights in relation to your information

At energy5, we take your privacy very seriously. We operate on the principle that your personal information belongs to you - and only you can decide who you want to share it with and why. We will only use the information that we collect about you lawfully (in accordance with the Data Protection Act 1998 and the General Data Protection Regulations (GDPR)).

This is fundamental to the way we work - and we are committed to providing a secure environment for storage of your personal information.

THIS IS THE INFORMATION WE MAY COLLECT ABOUT YOU

1. Information you provide, if you decide to contact us:

If you contact us (by phone or email or via the hospital), we may keep a record of that.

If you report a problem with your loaned energy5 device, we may keep that information. The information which you provide and we keep may include your name, address, telephone number and/or email address.

2. Information we collect about you when you use our website(s)

When you visit our website(s), we use technology such as that provided by Google Analytics to collect information about your visit to that website. This includes which pages you visit and how long you spend on the website. You can find more information about Google Analytics here: www.google.com/analytics.

3. Information we collect about you when you participate in our research

We may sometimes ask you for information before you start using the energy5 device.

This could include contact details such as your email address, personal details such as your clinical condition, your name and demographic details such as your gender, date of birth or profession.

Some of this information is required (e.g. email address) and some is optional (e.g. profession).

What we collect is slightly different, depending on whether you are participating via a hospital or in direct feedback to energy5 Limited.



5. Information we may collect and store about the device you use and associated activity app

When you use our energy5 device, we collect information directly associated with changes in your clinical condition and your general wellness.

THIS IS WHAT WE DO WITH THE INFORMATION WE COLLECT ABOUT YOU

1. The information you provide, if you decide to contact us

We use it to correspond with you and we keep it in case we need to contact you in the future, in relation to the issue for which you contacted us.

2. The information we collect about you when you use a website

We use Google Analytics because the information it collects, enables us to analyse how you and others interact with our Website.

3. Information we collect about the device you use

We collect this information and aggregate it - and it provides us with demographic information which we then use, to, for example, tailor our products to such demographics.

We also use a device ID called an IDFA for advertising purposes and to acquire new customers for our products, as explained further in this Policy.

Where we propose using your personal information for any other uses, we will ensure that we notify you first. You will also be given the opportunity to withhold or withdraw your consent for the use of your personal information for purposes other than those listed above.

OUR USE OF AGGREGATED AND ANONYMISED INFORMATION

We may share aggregate user statistics and other usage data which does not identify you personally with third parties.

We may combine this information with that of other users of our energy5 device and share or provide this information in aggregated and anonymised form with third parties such as universities.

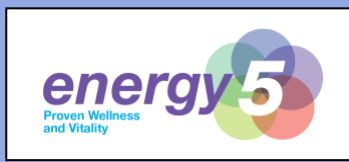
We may at any point anonymise personal information to make sure that such information can no longer be related back to you. We do all this to help us improve the design and delivery of our energy5 device - and to assist in research.

THIS IS WHO WE SHARE YOUR INFORMATION WITH

We will only share information with other organisations where we have your clear permission to do so, in accordance with this Policy.

This is where we believe it could be necessary for a legitimate reason connected with our products, or where it is necessary for us to comply with the terms and conditions of a website.

We will only share information with a third party once we have been completely satisfied that such third party will keep that information secure.



We use third parties to help in our communications with you. For example, we use a company called Money Penny to help us keep track of our customer support emails.

We work with analytics providers such as Google Analytics, which may involve information about your use of a website being processed by Google.

Finally, we may disclose your personal information to third parties:

Only if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation or request.

To enforce or apply our terms of use/terms and conditions and other agreements or to investigate potential breaches.

To protect the rights, property or safety of our products, or our users.

OUR USE OF COOKIES AND OTHER IDENTIFIERS

Cookies are small pieces of data that are stored on your computer, mobile phone or other devices.

They do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences and generally improving your experience of a website.

Cookies make the interaction between you and a website faster and easier.

The only cookies we use, are from Google Analytics, which distinguish you from other users of the website. The cookie distinguishing you in this way, lasts for two years.

This helps us to provide you with a the very best experience when you use the website and also allows us to improve the website. We do not use cookies on apps.

In some cases, we use device identifiers called 'IDFA's' which operate like cookies. Please refer to your device's help material to learn what controls you can use to remove cookies, block cookies, or disable IDFA tracking.

If you do this, it may affect your use of a website or an app.

THIS IS WHERE WE STORE YOUR INFORMATION

The data that we collect from you, will not be processed outside the European Economic Area (EEA).



KEEPING INFORMATION SECURE

All information you provide to us, is stored on servers owned and operated by Redditch Connected Limited. More information on this provider is available at <https://www.redditchconnected.co.uk/>.

HERE ARE YOUR RIGHTS

We think it is important that you are able to control your personal data.

You have the right to ask us at anytime, not to process your personal data for marketing purposes.

You can exercise your right to prevent such processing, by contacting us using email at: contact@energy5.co.uk or by telephone +44 (0) 330 090 4777.

The law gives you the right to request a copy of the personal information we hold about you. We first require you to prove your identity with two pieces of approved identification.

We will supply, correct or delete personal information about you on our files, as requested.

In addition, you may request rectification or erasure of personal information, as well as the restriction of the processing of your personal information.

If you wish to complain about the processing of your personal information, then please contact us first, but if we do not satisfactorily deal with your complaint, then you may contact the Information Commissioner.

If you want to stop using a website, you may do so. If you do, you may also want to remove any cookies that we have placed on any device used to access a website.

THIRD PARTY PROPERTIES ACCESSED FROM A WEBSITE AND/OR APP

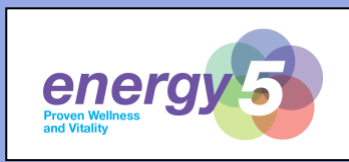
Our websites and apps may contain links to and from the online properties of third parties.

If you follow a link to any of these online properties, please note that these online properties have their own privacy policies which will govern use of any personal data that they process.

Please check these policies carefully before you click on any links and/or submit any personal data to these online properties.

CHANGE OF CONTROL

If the ownership of our business changes, we may transfer your information to the new owner so they can continue to operate the websites and the apps. The new owner will be obliged to comply with this Policy.



CHANGES TO OUR POLICY

Any changes we may make to this Policy in the future, will be posted on our website.

Where it makes sense because the changes are material, we will notify you of the changes by e-mail or in another appropriate manner, such as when you next interact with an energy5 website or app.

CONTACTING US IS EASY - AND WE WANT TO HEAR FROM YOU

We really do welcome any questions, comments and requests you may have regarding this Policy. You can contact us by emailing us at contact@energy5.co.uk or by telephone +44 (0) 330 090 4777.

Alternatively, please use the postal correspondence address, or the “Get In Touch” enquiry form found in the “Contact us” section of our www.energy5.co.uk website. energy5 will only action written requests which are sent in this medium; verbal requests are not acceptable.

Date: May 2020

Version: One