

# Website Privacy Policy

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<b>Approved By</b>	<b>Declan Bright</b>
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# Change History

Date	Version	Created By	Description of Change
12 Mar 2021	0.1	Ward Solutions	Initial version combining Personal Data Privacy Statement and Website Cookie and Social Networking Media Policy
22 Mar 2021	0.2	Ward Solutions	Minor updates per Australian Privacy Principles Compliance. Added section 'Australian Privacy Principle 9: Adoption, Use or Disclosure of Government Related Identifiers'
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23 Mar 2021	1.0	Declan Bright	Reviewed and approved
02 Feb 2024	1.1	Richard Eibrand	Reviewed and updated Office address
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03 Jun 2025	1.2	Richard Eibrand	Added statements about AI usage
03 Jun 2025	1.2	Declan Bright	Reviewed and approved
20 Jan 2026	1.3	Richard Eibrand	Added a section relating to recording of meetings, screensharing, video and voice
20 Jan 2026	1.3	Declan Bright	Reviewed and approved

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# Personal Data Privacy Statement for Oneview Healthcare

This data privacy statement applies to Oneview Healthcare, 2nd Floor Avoca Court, Temple Road, Blackrock, Dublin A94 R7W3 Ireland.

The purpose of this statement is to explain how Oneview Healthcare (hereinafter referred to as "Oneview Healthcare", "we" or "us"), collect, process, store and keep secure your personal data in connection with our business in accordance with the Data Protection Act 2018 and the GDPR Regulation (EU) 2016/679.

## How We Collect Your Personal Data

### *Information supplied to us*

Personal data is normally supplied either by you, the data subject, or by a third-party partner (from our third-party partners). It is normally collected from visits to our website, by post, by phone, by fax, directly from data subjects or by email correspondence. We obtain personal information when you register for or request certain services. By registering and/or submitting personal information to us, you are also agreeing to the use of this information in accordance with our Privacy Statement.

### *Information Automatically Collected by Us*

Examples of the information we automatically collect and analyse include Internet protocol (IP) addresses (used to connect devices to the Internet), user login details, e-mail address, cookies, and details of products/services that visitors viewed or searched for on our website.

## Information We Collect

### *Non-Personal Data*

We may gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This Non-Personal Data comprises information that cannot be used to identify or contact data subjects, such as demographic information regarding, for example, user IP addresses (where they have been clipped or anonymised), browser types and other anonymous statistical data involving the use of our website (<https://www.oneviewhealthcare.com/>).

### *Personal Data*

This is data that identifies individuals or can be used to identify or contact individuals and may include information such as a name, address, email address, birth date, marital status, occupation and salary range. While information such as name and email address is required by us to provide customers with our services, other personal data is only collected from data subjects if it is voluntarily submitted to us.

Data Type	How it is collected
Contact Data	Various forms and enquiry sections allow you to provide us with contact data for the purpose of contacting you with a quote, offer or other legitimate business-related activity. This may include home / office address, email address and telephone numbers.
Identity Data	When you complete a form or other entry on the website it may include identity data. This could include first name, last name, title, date of birth and gender.
Marketing and Communications Data	This includes your preferences in receiving marketing from us and our third parties and your communication preferences, occupation, and transaction history
Usage Data	Analytical data is gathered for digital marketing purposes and can include information about how you use our website.
Technical Data	Cookie information is gathered upon visiting our website. This includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
Financial Information	Detailed financial information including all facets of information required for engineering projects
Interactions Data	Information about your interactions with us, including correspondence and phone / video conference calls between us and you.

## Special Category data

We do not collect special category data.

## Recordings of Calls, Meetings, and Screen Sharing

We may record and process audio, video, screen sharing content, chat messages, and related metadata from calls, meetings, and support sessions. We use these recordings for legitimate business purposes including service delivery, support and troubleshooting, training and quality assurance, documentation and note-taking, security and compliance, and to improve our products and services. Where required by law, we will obtain your consent before recording. You will be notified when a session is being recorded and you may choose not to participate in the recording (e.g., by turning off your camera/mic/screen share or leaving the session). Recordings are accessible only to personnel and service providers with a need to know, under appropriate confidentiality and data processing terms.

# How We Process Your Personal Data

## Use of AI

Data collected through the Oneview website, email or call recordings is not used to train AI models, nor is it used for automated decision-making purposes. The data collected may be processed by AI services for the purposes of summarisation, analytics and other business processing in accordance with applicable privacy laws and our internal data protection policies.

## Non-Personal Data

We use Non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us better design and organise our website.

## Personal Data

Personal information which you supply to us may be used for the following purposes:

Purpose of Processing	Lawful Basis for processing
Manage and respond to any requests you have made to us.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
To help us identify you when you contact us.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
To provide you with the most user-friendly online navigation experience.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
For general administration, reporting, audit and analysis purposes and to manage our relationship with you.	It is necessary in our legitimate interests and to ensure the effective management of our business.
For market research purposes and customer satisfaction surveys. This helps us improve the quality of our products and services we provide.	The data subject has given consent to the processing of his or her personal data for one or more specific purposes
To market to you and, where appropriate, to invite you to any events that we might organise.	The data subject has given consent to the processing of his or her personal data for one or more specific purposes
To comply with legal obligations. If required by any law enforcement agency, court, regulator, government authority or other third party.	Processing is necessary for compliance with a legal obligation to which the controller is subject

Pass on to any third party that purchases, or to which we transfer, all or substantially all of our assets or business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Policy.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
To carry out analysis. We may combine and analyse your personal information to help us develop and improve our products and services, understand our customers better; and to manage and improve our relationship with you.	The data subject has given consent to the processing of his or her personal data for one or more specific purposes

## How We Protect Your Personal Data

Oneview Healthcare has successfully undergone certification for the ISO/IEC 27001, ISO/IEC 27701, and ISO/IEC 42001 standards.

### *Data Storage*

Personal Data is stored securely in electronic form on our IT systems and /or in hard copy form in our offices. We have invested in both technical and organisational security measures and training of employees to safeguard all personal data.

### *Retention Period*

The length of time we will retain your personal data will depend on the purpose for which we are processing it. The following criteria will be applied:

- We will retain personal data for the minimum period required for the purpose(s) of processing.
- Personal data will be retained for a period of time subject to our data retention policy and/ or legal requirements.
- When personal data is no longer required to be retained, it will be anonymised, to remove all personal identifiable information, or deleted in a secure manner in accordance with our technical and organisational procedures.

### *Security*

The security of your personal data is important to us. We restrict access to personal information to our employees, contractors and processors who have a requirement to process your personal information.

Your personal information is only processed on our instructions, under a duty of strict confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable data protection regulator of a breach where we are legally required to do so.

We employ a range of managerial and training measures to ensure that all relevant staff are suitably trained and are aware of our data protection obligations when processing personal data.

Transmission of personal data over the Internet (for example web-forms or email) is insecure. Therefore, we cannot guarantee the safety and security of personal data transmitted in this way.

## Sharing Your Personal Data

We will only use your Personal Data where we have a lawful purpose to do so. We will never sell Personal Data to a third party. We will only pass Personal Data to a third party where there is an explicit business need to do so.

We will not share your information with any third parties unless one of the following conditions applies:

- As required by law, any applicable regulation to protect the rights, property, or safety of ourselves or others.
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.
- If Oneview Healthcare is involved in a merger, acquisition, or sale of all or a portion of its assets, to any prospective seller or buyer of all (or part of) our business or assets. You will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.
- Where you have given your consent to pass your personal data to a third-party marketing companies who might contact you on our behalf with information about products and services which may be of interest to you

## Third Parties We May Share Your Personal Data With

Third Party	Reason
Third Party Service Providers	We may share your personal information with third party service providers that perform services and functions at our direction and on our behalf such as our accountants, IT service providers, printers, lawyers and other business advisors, and providers of security and administration services. All providers are reviewed through Oneview's supplier management process.
Potential Sale of the Company	We may transfer your personal information to companies we plan to merge with or be acquired by.
Local police, Government Bodies (or officials)	We may share your personal information with local police or other government bodies or agencies where we are required to do so by law.



## Marketing

If you have consented to marketing from us, we may contact you with information about our products and services through email. All such communications will come from us, or from our selected marketing partners.

You have the right at any time to stop us from contacting you for marketing purposes or giving your information to third party marketing companies. You will also be given the opportunity on every email communication that we or our trusted partners send you to indicate that you no longer wish to receive our or their direct marketing material.

Oneview use HubSpot as a third-party provider of website marketing services. HubSpot generates sales leads for Oneview as a result of website visitor information such as their location.

## Cookies

See Website Cookie and Social Networking Media Policy outlined below.

## Links to other Websites

Our websites may provide links to third-party websites and applications such as supplier brand websites, for your convenience and information. Oneview Healthcare is not responsible for the privacy practices or the content of such websites or for the privacy policies and practices of other third parties. If you decide to click on a third-party link thus enabling a connection, those connections may allow third parties to collect or share data about you. We encourage you to read the individual privacy and cookie policy of every website that you visit.

## Social Networking Site Links

See Website Cookie and Social Networking Media Policy outlined below.

## International Transfers

Information we collect will not be processed in or transferred to any country or territory outside of the European Economic Area without having a legal basis. If we undertake international transfers in the future, you will be contacted before any such transfer takes place with the following information:

- Transfer to the third country
- Details regarding the safeguards that are in place to protect your personal information.

For website visitors based in Europe, the data is retained in Europe by Oneview and any subsequent transfer to the US is under legally approved mechanisms.

For website visitors outside of Europe, the data is retained outside of Europe by Oneview.

For data handled by HubSpot, please check the following link for clarification:

<https://knowledge.hubspot.com/account/hubspot-cloud-infrastructure-frequently-asked-questions>

The relevant legislation for website visitors based in Australia is the: Australian Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Australian Privacy Act 1988.

There are 13 Australian Privacy Principles (APPs). The main section 8 (cross-border) requirements are met as follows:

This Privacy Policy has a Disclosure/Data Sharing section named International Transfers.

This section states that Oneview discloses Australian personal information to overseas (non-Australian) recipients, and the likely countries that information may be sent to, by providing the hyperlink for the personal data handled by HubSpot.

The likely specified circumstances for such a transfer are stated in the section 'Third Parties We Share Your Personal Data With' section listing HubSpot. HubSpot generates sales leads for Oneview as a result of website visitor information such as their location.

## Australian Privacy Principle 9: Adoption, Use or Disclosure of Government Related Identifiers

### **Adoption of Government Related Identifiers:**

Oneview will not adopt as its own identifier an identifier that has been authorised under Australian law. Examples are an individual's Medicare or tax file number.

### **Use or Disclosure of Government Related Identifiers:**

Oneview will not use or disclose an identifier unless:

- It is to verify the identity of the individual for the purposes of their activities/functions
- It is necessary for Oneview to fulfil its obligations to an agency or a State/Territory
- It is required/authorised by law
- A permitted general situation exists in relation to the use/disclosure of the identifier
- Oneview reasonably believes that the use or disclosure of the identifier is reasonably necessary for one or more enforcement related activities conducted by or on behalf of an enforcement body

## Updating Your Personal Data

In order to help us ensure the personal data we hold about you is accurate and current, and to help us to provide you with our services, we encourage you to keep us informed if your personal data or circumstances change. To update your personal data please contact us at the details set out below in the **contact information** section.

## Contact Information

If you have any questions or comments about this privacy statement, or if you wish to request information, you can contact us at: [datarequests@oneviewhealthcare.com](mailto:datarequests@oneviewhealthcare.com).

## Changes to this Statement

We may update our Privacy Statement from time to time, by communicating such changes to you and publishing the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your personal information.

## Cookies

### What are “cookies”?

Cookies are a small text-only files saved on your computer's hard drive, when browsing websites. They are designed to hold data specific to a particular user. They may allow a website “remember” your actions or preferences over a period of time. They help us to improve our website and to deliver a better and more personalised service.

Cookies can be used to:

- Identify users
- Remember users' custom preferences
- Help user's complete tasks without having to re-enter information when browsing from one
- Page to another or when visiting the site later.

Cookies may be used by Oneview to analyse user behaviour to generate sales leads in combination with a selected third-party provider.

Cookies may potentially be used for online behavioural target advertising and to show adverts relevant to something that the user searched for in the past, however Oneview do not engage in this activity at present.

### Types of Cookies

- **Preference:** Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- **Statistic:** Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing:** Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers
- **Unclassified:** Unclassified cookies are cookies that are in the process of being classified, together with the providers of individual cookies
- **Necessary:** These are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website. These cookies are deleted when you close your browser.
- **Functionality:** These cookies are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences from a previous visit to our website.

- **Session cookies:** These are used to maintain your session when your login or when purchasing a product through our online shop. If you choose to deny this cookie, this will affect your ability to purchase products online or to remain signed in on your account online.
- **Authentication cookies:** They help to identify the user once they have logged in, for the duration of a session (visit to a website).

## Third Party and Tracking cookies

Oneview Healthcare use third party cookies in order to improve our website, to personalise your experience, track unique visitors and to understand how visitors behave on this website. We also use cookies to make our advertising on other websites more relevant. Using information collected about you for advertising purposes is known as targeted or behavioural advertising. It is possible for such adverts to store a cookie for a third-party site, containing information such as the name of the site, particular products being viewed, pages visited, etc.

## Cookies We Use on Our Website

Cookie Name	Cookie Details
Preferences: lang	Remembers the user's selected language version of a website
Statistics: __hssc	Identifies if the cookie data needs to be updated in the visitor's browser
Statistics: __hssrc	Used to recognise the visitor's browser upon re-entry on the website
Statistics: __hstc	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes
Statistics: _ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website
Statistics: _gat	Used by Google Analytics to throttle request rate
Statistics: _gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website
Statistics: hubspotutk	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes
Marketing: __ptq.gif	Sends data to the marketing platform HubSpot about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels
Marketing: bcookie	Used by the social networking service, LinkedIn, for tracking the use of embedded services
Marketing: bscookie	Used by the social networking service, LinkedIn, for tracking the use of embedded services

Marketing: embed/v3/counters.gif	Collects information on user preferences and/or interaction with web-campaign content - This is used on CRM-campaign-platform used by website owners for promoting events or products
Marketing: IDE	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user
Marketing: lang	Set by LinkedIn when a web page contains an embedded "Follow us" panel.
Marketing: lidc	Used by the social networking service, LinkedIn, for tracking the use of embedded services.
Marketing: test_cookie	Used to check if the user's browser supports cookies.
Marketing: UserMatchHistory	Used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor's preferences.
Marketing: VISITOR_INFO1_LIVE	Tries to estimate the users' bandwidth on pages with integrated YouTube videos
Marketing: YSC	Registers a unique ID to keep statistics of what videos from YouTube the user has seen
Marketing: yt.innertube::nextId	Registers a unique ID to keep statistics of what videos from YouTube the user has seen
Marketing: yt.innertube::requests	Registers a unique ID to keep statistics of what videos from YouTube the user has seen
Marketing: yt-remote-cast-installed	Stores the user's video player preferences using embedded YouTube video
Marketing: yt-remote-connected-devices	Stores the user's video player preferences using embedded YouTube video
Marketing: yt-remote-device-id	Stores the user's video player preferences using embedded YouTube video
Marketing: yt-remote-fast-check-period	Stores the user's video player preferences using embedded YouTube video
Marketing: yt-remote-session-app	Stores the user's video player preferences using embedded YouTube video
Marketing: yt-remote-session-name	Stores the user's video player preferences using embedded YouTube video
Unclassified: AnalyticsSyncHistory	Unclassified

## How to manage cookies

Within your browser, you can choose whether you wish to accept cookies or not. If you choose Cookie Preferences, you will see the following preferences:

Different browsers make different controls available to you and so we provide links below to popular manufacturers' instructions on how you can do this. Generally, your browser will offer you the choice to accept, refuse or delete cookies at all times, or those from providers that website owners use ("third party cookies"), or those from specific websites.

- Google Chrome <https://support.google.com/chrome/answer/95647>
- Internet Explorer <https://support.microsoft.com/en-ie/help/17442/windows-internet-explorer-delete-manage-cookies>
- Firefox <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Safari MacOS <https://support.apple.com/en-ie/guide/safari/sfri11471/mac>
- Safari Mobile <https://support.apple.com/en-us/HT201265>
- Opera <https://help.opera.com/en/latest/security-and-privacy/>

You can opt out of behavioural advertising on the web browser you are currently using with an "opt-out cookie" by visiting <http://www.youronlinechoices.com/ie/your-ad-choices>

# Social Networking Media Website Links

## Social Networking Site Links

Our website may contain links to external social network sites such as Facebook, LinkedIn, YouTube and Twitter. These external social networks are exclusively operated by their respective owners. All Links to Social networking sites are made clearly visible on our website through the use of representative logos. If you decide to follow these links, you will be directed to a third-party website which is not under our control. Cookies and plug-ins may be activated and your browser will establish a link with relative social network site directly.

If you follow the links on our website whilst you are signed into these social network sites, personal information such as user account details and information concerning your visit to our website may be passed to these third-party websites. This information may be transferred to and stored to a third-party entity.

Your personal information will not be transferred to these third-party social networking sites by visiting our website, but may result in personal data being transferred to a social network entity if you decide to click the relevant link.

For further information on third party privacy and cookie policies, please refer to the relevant third-party social network's privacy and cookie policies on their websites.

## Social Network Links We Use on Our Website

Vendor Name	Personal Data that may be Collected
LinkedIn	LinkedIn email address
Facebook	Facebook email address
Twitter	Twitter email address
YouTube	YouTube email address
Instagram	Instagram email address

## Contact Details

If you have any questions regarding our cookie policy or our privacy policy, please contact us at:

Email: [datarequests@oneviewhealthcare.com](mailto:datarequests@oneviewhealthcare.com)