



DATA & PRIVACY POLICY

8th May 2018

PLEASE READ THIS PRIVACY POLICY CAREFULLY AND RETAIN A COPY FOR YOUR RECORDS. THIS POLICY FORMS PART OF RETURN2PLAY'S TERMS AND CONDITIONS.

Return2Play Ltd, registered in England and Wales with company number 09616661, (Return2Play, we), respects the privacy of every person and is committed to protecting all of your personal data (Personal Data), including sensitive personal health information.

Personal Data means any information that may be used to identify an individual, including, but not limited to: a first and last name, a home or other physical address, and an email address or other contact information, whether at work or at home.

This privacy policy (Policy), together with our Terms and Conditions, applies to your use of the website at return2play.org.uk (Website) and our services (Services and Platform).

Return2Play Ltd, Bryden Johnson, Lower Coombe St, Croydon CR0 1AA, is registered with the UK's Information Commissioner's Office (ICO) as Data Controller in accordance with GDPR with Registration Number ZA155207.

The Policy will serve as a summary of your privacy rights. The law, the General Data Protection Regulation (EU 2016/679) effective 25th of May 2018, requires that your Personal Data be kept private unless there is a legal obligation or requirement for disclosure by us to authorised parties, in which case we will make such disclosure(s) as legally obliged. We must give you this notice about our privacy practices and follow the terms of this Policy while it is in effect.

Your use of our Platform and Services indicates your acceptance of the terms of this Policy.

INTRODUCTION

Return2Play is a platform via which individuals (User, Users, you) can store details of injuries they sustain, document their recovery, and be linked to participating doctors registered with the UK General Medical Council: www.gmc-uk.org, (the GMC) (known as Practitioners).

The Platform and its Services enables Users, at their sole discretion, to share injury information with other parties and allow these parties to add information to their online account (Account).



INFORMATION YOU PROVIDE

According to the General Data Protection Regulation, each Personal Data processing by Return2Play will be performed on one of the following legal basis:

- Your consent;
- The performance of the Services subscribed by You;
- The legitimate interest pursued by us or by a third party, except where such interests are overridden by Your interests or Your fundamental rights and freedoms.

In order to use our Platform or Services, you may be asked to provide personal details such as your name, address, age, e-mail address and phone number, username, password and other registration information.

The first time you log in to the Platform you will be asked to create an account. To create an account, you must provide Personal Data that will be shared with members of the Return2Play team (from time to time, as required) who have been appropriately checked to ensure they meet the requirements to access such information (in accordance with UK law). After you create your Account you can use the same details to log in to the Platform and use the Services.

We may use the information we collect from You in connection with the Services we provide for a range of reasons, including:

- To set up your Account;
- Provide, operate and maintain the Services;
- Process and complete transactions, and send related information, including confirmations and invoices;
- Manage your use of the Services, respond to enquiries and comments and provide customer service and support;
- Send you technical alerts, updates, security notifications, and administrative communications;
- Investigate and prevent fraudulent activities, unauthorized access to the Services, and other illegal activities; and
- For any other purposes about which we notify customers and Users.

We may also use the information you send to us via the Platform and/or Services to communicate with you via email and, possibly, other means, regarding products, services and events we think may be of interest to you or to send you our newsletter, if this is in accordance with your marketing preferences. However, you will always be able to opt-out of such communications at any time (see sections below).

If you contact us, we may keep a record of that correspondence.



Third Party Information

We do not rent or sell your Personal Data to anyone.

We may share and disclose information (including Personal Data) about our customers or Users in limited circumstances to other service providers. We are working closely with third parties (including but not limited to, for example, business partners, sub-contractors in technical, payment and delivery services, analytics providers, search information providers) and may receive information about you from them. These companies include (for example) but are not limited to our payment processing providers, website analytics companies (Google Analytics), and CRM service providers.

We may associate any category of information with any other category of information and will treat the combined information as Personal Data in accordance with this Policy for as long as it is combined.

HOW WE USE YOUR DATA

Return2Play will use the email address you provide when you register to send you an email to validate your Account. Your email address, telephone number and other contact information that you provide via your Account may also be used by Return2Play to enable your use of the Platform and Services. Return2Play will use your email address as the primary means to reset your username and password.

We will use your Personal Data:

- To carry out our obligations arising from any contracts entered into between You and Us and to provide You with the information and Services that you request from Us;
- To provide, maintain and improve Our Services;
- To notify you about changes to the Platform and/or Services;
- To send you technical notices, updates, security alerts and support and administrative messages;
- To respond to your comments, questions and requests and provide customer service;
- To ensure that content from the Platform is presented in the most effective manner for you and your computer or device;
- To undertake planning, Services evolution, new product development, Services delivery, internal and external performance indicators and a range of other business intelligence functions;
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To allow you to participate in interactive features of the Services;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- For purposes made clear to you at the time you submit your information (for example to fulfil your request for a demo, to provide You with access to one



of our webinar's or eGuide or to provide You with information you have requested about our Services);

- As part of our efforts to keep our Platform and Services safe and secure.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective buyer or seller.
- If Return2Play or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal or regulatory obligation or request.
- In order to:
 - Enforce or apply the Terms and Conditions or to investigate potential breaches; or
 - Protect the rights, property or safety of Return2Play, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

SENSITIVE PERSONAL DATA

In order to deliver our Services, Return2Play may hold health information about yourself.

This includes health information collected when injuries are recorded, notes and symptom logs that are added to injury records. This is classed as sensitive personal data under the General Data Protection Regulation.

Information that Practitioners on the Platform record in your online notes (your Electronic Medical Records or EMRs) will include relevant and pertinent information that you have discussed with Practitioners on the Platform.

Such EMRs may also include Practitioners' comments, diagnoses and commentary as well as factual information, medical advice and the symptoms that you have presented with in a session.

HOW INFORMATION ABOUT YOU MAY BE USED BY RETURN2PLAY

Use and Disclosure of Sensitive Personal Data

Return2Play may gather sensitive personal data, as described above, to allow the Services to be delivered.



Return2Play may also use aggregated, anonymised data sets of unidentifiable, non-personal information for: (i) statistical analysis, improvement of the Services and customisation of UX-design and content layout or creation; or (ii) sharing with government agencies or regulators that oversee and monitor health care providers in both the public and private sectors.

Further, Return2Play is permitted to use and disclose your sensitive personal data for purposes of: (a) treatment; and (b) to enable medical service provision, as follows:

- **To Prevent Incidents and Protect You:**

Return2Play may use and disclose your Personal Data to the extent required to prevent a serious threat to your health and safety or that of others (including but not limited to instances of child abuse or neglect). In such circumstances Return2Play will only disclose your Personal Data to public bodies or officials who can help prevent the identified or possible threat.

- **To Prevent Public Health Risks:**

Return2Play may share your Personal Data for public health activities, as required by departments or parties duly authorised by the UK Government. For example, we may share your Personal Data:

- o To report reactions to medicines or problems with products;
- o If a Practitioner believes that you may have been exposed to, or may be at risk of spreading, certain specified serious diseases or conditions.

- **Legal Disputes and Cases:**

If you are involved in a legal dispute, Return2Play may share your Personal Data in response to a court order, legal demand or other lawful process.

- **The Police:**

Return2Play may share sensitive personal data if asked to do so by the police in certain limited circumstances, including reporting of certain types of wounds.

- **National Security:**

Return2Play may share, if required, your Personal Data with UK Government officials for national security reasons (as permitted by the GDPR).

COOKIES

Our Website and some of our Services use cookies and other similar tracking technologies (like web beacons, tags and scripts) to uniquely identify your browser and to gather information about how you interact with the Website and Services.

A cookie is a small text file containing a string of alphanumeric characters that may be placed on your computer or device or web browser when you visit the Platform and/or Website. When you next visit the Platform or Website the cookie allows us to distinguish you from other users.



We use cookies and other similar technologies to collect information for the purposes described in this Privacy Policy and for the following purposes:

- Assisting you in navigation;
- Providing you with the Services or products that you have requested
- Assisting in registration, login, and your ability to provide feedback;
- Enabling and facilitating communication;
- Analyzing your use of our products, services or applications; and
- Assisting with our promotional and marketing efforts;

There are two categories of cookies: (a) 'persistent cookies' that remain on your computer or device until deleted manually or automatically; and (b) 'session cookies' which remain on your computer or device until you close your browser, when they are automatically deleted.

The cookies Return2Play uses:

- Essential cookies are required for the operation of the Platform and without them the Platform can't operate properly. They are strictly necessary for the provision of our Services. These are session cookies for authenticating and connecting to the Services, as well as memorizing navigation items during a session.
- Performance cookies allow us to see and count the number of visitors to the Platform and what they do during their visit. We use the information from these cookies to improve the Platform's performance. The data from these cookies doesn't allow us to identify you.
- Experience cookies allow the Platform to remember your choices, which means we can personalise your experience of the Platform. Data collection by experience cookies is used by our analytics systems (including third party systems) to monitor and enhance the Platform's user-friendliness.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical / performance cookies or targeting cookies.

You have the ability to decline cookies by changing the settings on your browser but this might prevent you from benefiting from some elements of the Services. You can also consult or destroy cookies if you wish, since they are stored on your hard disk.

You can refuse cookies, by activating settings of your chosen browser(s). If you alter your browser settings to refuse cookies, you may still use our Website but your access to some functionality and areas of the Platform and Services will be severely restricted.



We also utilize Google Analytics, a web analysis service provided by Google, to better understand your use of our Website and Services. Google Analytics collects information such as how often users visit our Website and what pages they visit. Google uses the data collected to track and examine the use of our Website. We do not combine the information collected through the use of Google Analytics with any Personal Data.

Google's ability to use and share information collected by Google Analytics about your visits to our Website is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to our Website by disabling cookies on your browser.

SECURITY

The importance of security for all your Personal Data including, but not limited to, sensitive personal data is of great concern to us. At Return2Play, we have gone to great lengths to manage the security and integrity of the Platform and its Services and to ensure that we use best-in-class services when providing secure transmission of information from your computer or device.

Our technical, administrative and physical procedures are designed to protect Personal Data from loss, theft, misuse and accidental, unlawful or unauthorized access, disclosure, alteration, use and destruction.

We follow the latest industry standards to protect the personal information submitted to us, both during transmission and once it is received.

If you have any questions about the security of your personal information, you can contact us at hello@return2play.org.uk

Personal Data collected via the Platform is stored in secure environments that are not available or accessible to the public; only those duly authorised people, officers, employees or agents of Return2Play who need access to your information in order to do their jobs are allowed access. Anyone who violates our privacy or security policies is subject to disciplinary action, including possible termination of their contract with Return2Play and civil and/or criminal prosecution.

Return2Play uses the latest technologies to ensure utmost security, including utilising several layers of firewall security and encryption of personal data to ensure the highest level of security.

Return2Play is the sole owner of any data collected via the Platform.

Data Storage:

The data that we collect from you is stored at data centres within the European Economic Area (EEA).



We may collect and store personal data on your device using application data caches and browser web storage (including HTML 5) and other technology.

Security when using the Platform:

When using the Platform, all your Personal Data are transmitted through the internet using Secure Socket Layers (SSL) technology. SSL technology causes your browser to encrypt your entered information before transmitting it to our secure server. SSL technology, an industry standard, is designed to prevent a third party from capturing and viewing your Personal Data.

No data transmission over the internet can be guaranteed to be 100% secure. While we strive to protect your Personal Data from unauthorised access, use or disclosure, Return2Play cannot ensure or warrant the security of any information you transmit to us via the Platform. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and Personal Data by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

YOUR RIGHTS

The General Data Protection Regulation (GDPR), gives you the right to access your Personal Data. You also may update, correct or delete by yourself your account information by logging into your Account.

You are entitled to access your Personal Data if you are:

- The data subject; or
- A representative of the data subject who has written consent; or
- The parent or guardian of a child under 16 years of age: In cases where the child agrees, or it was in the child's best interest for access to the data to be granted.

We are not obliged to comply with your request unless we have received:

- A request in writing.
- Enough information to identify you (or the data subject).
- Enough information to identify the information sought.

If your request is made on-line (email or social media) we may ask you to complete a Subject Access Request Form. We ask that you provide as much information as possible to allow us to narrow down our search. We will acknowledge your requests promptly.

Complete information will be sent to you, the requester, as soon as possible or within 1 month of receiving a valid request. When Return2Play receives a valid formal



request, it will be logged by the relevant department and you will receive a confirmation of this. If more information is needed, you will be contacted to provide further information.

Once all of the requested information is collated by us, we will review the data to ensure that:

- a) The information is clear and that all coded data is decoded and any business or medical terms are explained.
- b) Any information in relation to a third person is removed unless they have given their consent. If any information has been removed e.g. relating to another person OR all the information asked for is not given, an explanation will be included in a letter to you.

The data will be sent to you in an easily readable format (email, post) applying appropriate security, within one month of receiving your valid request.

Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, Return2Play may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request (as allowed by the GDPR).

You have the right to appeal against a decision to refuse access to your information. You have the opportunity to either write a letter of complaint or express your complaint orally with a possible satisfactory outcome.

You are also free to contact the Information Commissioner, who is the compliance lead on Data Protection in the UK.

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

Tel: 0303 123 1113 (local rate) or 01625 545 74 (national rate)

Web: <https://www.ico.gov.uk>

We would encourage you to raise any matters with Return2Play before the Information Commissioner.

OTHER PROVISIONS

Other Links:

The Platform may contain links to let you to visit other websites or mobile applications easily. If you click on a link to a third-party site or app, you will leave the Platform and go to the site or app you selected.

Because Return2Play cannot control the activities of third parties, we cannot accept responsibility for the content of any such sites or apps or for any use of your Personal Data by such third parties and we cannot guarantee that they will adhere to the same privacy practices as Return2Play. If you visit a third-party website that is linked



to our site, you should read that site's privacy policy before providing any personal information.

Notices, Amendments and Updates:

We may change this Privacy Policy at any time or substitute this Privacy Policy at our sole discretion. We reserve the right to make any revised policy effective for Personal Data we already have about you as well as any information we receive in the future.

We will post a copy of the updated Policy on our Platform and Website prior to any change becoming effective.

If we make changes, we will notify you by revising the dates at the top of the Policy (the effective date of this policy is displayed directly under the title of the document) and, in some cases, we may provide you with additional notice (such as by adding a statement to our Website homepage or sending you an email notification or by means of a notice on the Platform) or otherwise seek additional consent in accordance with applicable law prior to the change becoming effective.

You should check regularly for the most up-to-date version of this Privacy Policy whenever you access the Platform and Services.

Marketing Communications

You can opt-out of receiving certain promotional or marketing communications from us at any time, by using the unsubscribe link in the emails communications we send or by contacting us at hello@return2play.org.uk with the word "UNSUBSCRIBE" in the subject field of the email.

If you have any account for our Services, we will still send you non-promotional communications, like service related emails.

Access/Accuracy

To the extent that you do provide us with personal Information, Return2Play wishes to maintain accurate Personal Data. You may update, correct or delete by yourself your account information by logging into your Account.

If for any reason those means are unavailable or inaccessible, please contact us and we will make reasonable efforts to incorporate the changes in your Personal Data that we hold as soon as practicable.

ACCEPTANCE

You may choose whether or not to provide Personal Data to Return2Play. If you choose not to provide the Personal Data we request, you can still visit our Website,



but you may be unable to access certain options, offers, and services that involve our interaction with you.

By using the Platform and/or the Services you acknowledge your acceptance of our Privacy Policy, as updated from time to time. If you do not agree with this Policy, you should not use the Platform or the Services. It is recommended that you read this Privacy Policy each time you consider or choose to use the Platform or the Services to ensure that you have not missed any changes to this Privacy Policy.

Your continued use of the Platform following any changes to the Privacy Policy (which will be notified to you as described above) signifies your acceptance of those changes.

If you have any questions or concerns regarding this Policy, please contact us at hello@return2play.org.uk and we will try to resolve your concerns.