

## PRIVACY STATEMENT

MySMARTOH Privacy Policy relates to your personal identifiable information, collected by MySMARTOH (we, our) as part of the Subscriber (you, your, user) sign up process and your use of MySMARTOH services, and held by MySMARTOH as part of our day-to-day business dealings with you.

## COLLECTION STATEMENT

Why and how we collect and use data about you:

We provide services and products in the occupational health and information technology industries. Part of this service provision requires us to protect your privacy. The Personal Data Protection Act contains sections that we are bound by. They concern a number of principles in relation to the protection of your personal information and in how we must deal with our customers in relation to this information.

Personal information held by us may include your name, current and previous addresses, telephone/mobile numbers, e-mail address, employee, medical record, bank account and credit card details, details of your services and information we require to perform our services for you.

Sensitive personal information entered into Services we offer will not be used or disclosed by MySMARTOH except as authorised by you to perform our services for you and to provide summarised anonymous benchmarking data across all our clients.

Access to this information by your professional advisors or other representatives can only be granted by you.

Should you choose not to provide personal information we may not be able to provide you with the services you require or at a sufficient level that we regard as important for performing at best practice and as such we reserve the right to terminate the supply of this service to you.

Some of the information that MySMARTOH holds may be the same information as that which you enter in your MySMARTOH database, however our information is not collected only from that source.

Only you and your nominated representatives (which explicitly includes some MySMARTOH system administrative employees) have access to your database under normal operational circumstances with the exception of summarised anonymous data.

You agree that we may use your data as a part of summarised anonymous data for benchmarking, trends, analysis and reporting by our research team's products and services.

We agree that summarised anonymous data will not have enough detail to identify underlying individuals or individual businesses making up that data made available via our research teams products and services.

## HOW WE COLLECT YOUR PERSONAL INFORMATION

Why and how we collect and use data about you:

- In conversations with you and your employees, in person, from e-mail, social media and telephone,
- From third parties such as your employees, your accountant, related companies, credit reporting agencies or your representatives,
- From publicly available sources of information,
- When we are required to do so by law,
- From our own records of your usage of MySMARTOH services,
- From our own internal systems that automatically collect data such as login monitoring systems that track IP address, Device Name (MAC Address) and the type of web browser you use as examples,
- From 3rd party systems such as Google Analytics so we can better understand what interest you on our website (to personalise and target content that fits your interests) and what features you use in our products so we can better design them.

## HOW WE USE AND PROCESS YOUR PERSONAL INFORMATION

Your personal information may be used to:

- Form a contract with you such as accepting our terms to Trial MySMARTOH services,
- Provide our products and services to you,
- Collect payments and to administer your account,
- Provide you with product and service updates,
- For development of existing and new products and services,
- Maintain and update our business infrastructure and systems,
- Promote new products and services we create to you,
- Conduct research into our client base,
- To create aggregated (anonymous) benchmarking data,
- Comply with legal and regulatory requirements,

- Protect you from a variety security risks.

## **DISCLOSING YOUR PERSONAL INFORMATION**

In providing our products and services, and using your personal information, we will always keep your data private to the maximum extent commercially and practically possible. In the normal course of business and in order to provide your service we may be required to disclose some of your personal information to organisations outside MySMARTOH. Such organisations may include:

- Our outsourced service providers that host our data and manage our email campaigns.
- Your consultant or other professional advisors if you agree as part of the service.
- Organisations providing you with examination or assessment.
- Our legal, consultant or other professional advisors.
- Regulatory, government and other authorities as required by law.
- Other organisations involved in supporting our operations.
- 3rd Parties involved in our business (including their advisors and/or agents).

## **ACCURACY OF YOUR PERSONAL INFORMATION**

We take reasonable precautions to make sure that the personal information we hold is accurate and up-to-date. We appreciate notification of errors, omissions or changes in your personal information. This is especially important for information required for us to communicate with you, such as a change in name, email, phone or address.

## **SECURITY OF YOUR PERSONAL INFORMATION**

MySMARTOH takes reasonable steps that your personal information is protected from misuse, loss, unauthorised access, modification or disclosure. Some notable measures to ensure the security of your personal information include: Secure Socket Layer (SSL) connection encryption; and regular backups of the database. The security of this information is also dependent on your own measures to protect your MySMARTOH usernames, email addresses and passwords from disclosure and unauthorised use.

## ACCESS TO YOUR PERSONAL INFORMATION

You have the right to access any of your personal information that we hold, with some exceptions as allowed by law. To obtain a copy of this information, write to us requesting the information and we will provide it to you. MySMARTOH reserves the right to charge a reasonable fee for the provision of this information.

## RETENTION OF YOUR PERSONAL INFORMATION

We hold your data while you remain a subscriber to MySMARTOH. If you choose to leave MySMARTOH you should export your data. We hold your data for a 90 day safety period in case of malicious deletion or change of mind cases. Thereafter, for security, legal and cost of maintenance reasons we may schedule your data for deletion or to be anonymised at any time.

## YOUR AUTHORITY

By continuing to use our products or services or website you consent to MySMARTOH maintaining, using and disclosing your Personal Information as described in this document for a period of no less than seven years from the date of your last use of the system (or the date of the last use of the system by any user under your subscription, whichever is the latest).

## YOUR RIGHTS

At any time you can:

- Request to learn what Personal Information we hold about you.
- Request the deletion (erasure) of your information. This may include anonymisation pseudo-anonymisation of some data instead of total deletion.
- Correct that information online, or where this is not possible, via our service team.
- Object to the continued use, processing or storing of your personal identifiable information.
- Lodge a complaint with us via [admin@mysmartoh.com](mailto:admin@mysmartoh.com) and as a result, expect a review and investigation.
- Lodge a complaint with the regulatory authority for your country or economic zone.
- If you have any questions or comments about this policy please email [admin@mysmartoh.com](mailto:admin@mysmartoh.com) and we will attend to your query promptly.