

PRIVACY POLICY

INTRODUCTION AND GENERAL TERMS

Lunar Health Care Services Limited (**Lunar**) ("us", "we", or "our") is committed to protecting and respecting your privacy. To provide you with the full range of LUNAR's information and services, we are sometimes required to collect information about you. We recognise that you care about how your information is used and shared, and we appreciate your trust that we will do so carefully and sensibly. We are dedicated to ensuring the privacy of our **users on this website platform** and have implemented stringent security measures and procedures, so you can rest assured that any details you submit online remain secure. This Privacy Policy informs you on how we look after and process your personal data when you visit our website or use our service, and tells you about your privacy rights and the choices you have associated with your personal data. We want our services to be safe and enjoyable environments for all of our users.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By engaging or interacting with LUNAR or visiting the LUNAR website, you acknowledge acceptance of the practices described (collection and use of information) in this Privacy Policy. Whenever you provide information, we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (these laws are referred to collectively in this Privacy Policy as the "**data protection laws**"). We are a controller in respect of your information that we hold and process and are responsible for this personal data.

LUNAR may, from time to time, review and update this privacy policy to take account of new laws and technology and changes to LUNAR's operations. Please visit this page periodically to check for updates.

WHAT INFORMATION WILL WE COLLECT ABOUT YOU?

We store personal information when you: enter on our website; fill in forms on our website (including username and password); sign up to participate in or receive a service from any part of the website (such as newsletters, e-news, social media updates, request membership, surveys, competitions, live chats, message boards or register with the an online registration system used across different parts of this website); contract with us or engage in any actual or prospective projects with us; correspond or interact with us by phone, e-mail or otherwise; participate in any transaction through our website and through that transaction request services or information from us; and provide details of your visits to our website including, but not limited to, IP address, browser type, traffic data, location data, weblogs and other communication, data, whether this is required for our own billing purposes or otherwise. We also access, obtain and collect your information from third parties or any other way in accordance with applicable laws.

We do not request any of the following "special categories" of personal data about you: your race or ethnicity, religious or philosophical beliefs (other than your desire to engage in ethical trading), sex life, sexual orientation, political opinions, trade union membership, criminal convictions or offences, information about your health or genetic or biometric data. If you volunteer this information we may hold it in recorded format. It should be noted, however, that the personal information that we collect on individuals may include, but is not limited to, your name, date of birth, contact details (including email, home address, telephone and billing address), payment details and other personal information we collect in the course of a transaction or that you provide to us when you contact us.

HOW DO WE COLLECT INFORMATION THROUGH COOKIES?

Our website uses cookies and similar tracking technologies to track activities on our services. Cookies record information about your online preferences and contain information by which LUNAR can identify your computer to our servers. We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. We may also collect information about your computer, including where available your IP address (an IP address is a number that can uniquely identify a

specific computer or other network device on the internet), operating system, browser type and analysis software. LUNAR endeavours to collect personal information about an individual only from that individual. In some circumstances LUNAR may obtain personal information from a third party.

LUNAR may use information it collects from you for the primary purpose for which it is collected and for such other secondary purposes that are related to the primary purpose of collection. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit. LUNAR may use information contained in cookies to make assumptions about the user of the computer and to provide users of that computer with focused advertising that LUNAR believes may be of interest, based on that information. In some cases a web page might contain more than one cookie. The information gathered from these different cookies are used to build statistical and demographical information which does not identify you personally to advertisers and other third parties for marketing, promotional purposes. Please note that our advertisers may also use cookies, over which we have no control. Users have the opportunity to set their devices to accept all cookies to notify them when a cookie is issued, or not to receive cookies at any time. However, if you do not accept cookies, you may be unable to access certain parts of our website. Cookies allow you to take full advantage of some of LUNAR's features, and we recommend that you leave them turned on. Moreover, certain personalised services cannot then be provided to you and accordingly you may not be able to take full advantage of our features.

HOW WILL WE USE THE INFORMATION WE COLLECT ABOUT YOU?

We use personal information held about you for the primary purpose for which it is collected and for such other secondary purposes that are related to the primary purpose of collection. Generally, we use your personal information for a number of purposes including the following:

- to provide you with the information, products and services that you request from us or expressly indicate are relevant to you;
- to provide you with the most user-friendly navigation experience and to allow you to participate in interactive features of our service and when you choose to do so;
- to analyse, improve, personalise, manage, enhance and customise your experiences and the way content is presented to you and for your computer;
- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and in order to keep our website safe and secure;
- to carry out and meet contractual arrangements and obligations arising from any contracts entered into between you and us, including payment of invoices;
- to communicate, stay in contact with you, contact you about a submission you have made to the website (including access to any ongoing information, service administration purposes, opportunities and any content you provide) and to give you the opportunity from time to time to receive email and 'e-newsletters' from us; and
- to use IP addresses to identify the location of users, the number of visits from different countries and also to block disruptive use.

HOW DO WE DISCLOSE OR SHARE YOUR INFORMATION?

We may disclose to or share your personal information with other affiliated companies and third party companies. Third parties, amongst others, include subcontractors, suppliers and those engaged by us to perform functions on our behalf.

We may disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply any terms of use or other agreements;
- to prevent or investigate possible wrongdoing in connection with the service and to protect against legal liability;
- to protect and defend the rights, property, or safety of our members (including schools), other users of our website, materials or services or others. This includes exchanging information

with other companies and organisations for the purposes of fraud protection and credit risk reduction;

- where this will help us to provide our services to you more effectively, in ways you are expressly aware of; and
- in the event where we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

Where such disclosure is made, we will take reasonable measures to ensure third parties understand the confidential nature of your personal data and any limitations on its use, and have appropriate security controls in place. We protect your personal information held by us from misuse, loss, unauthorised access, modification or disclosure by various means including firewalls, password access, secure servers and encryption of credit card transactions. It is important for you to protect against unauthorised access to your password and to your computer. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure.

Additionally, your information may also be processed by staff operating inside or outside the EEA who work for us or for one of our suppliers or contacts. Such staff maybe engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. Once we have received your information, we will use reasonable procedures and security features in our systems to try to **prevent unauthorised access**, including encryption of our hardware. 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 on our instructions and they are subject to a duty of confidentiality. By submitting your personal data, you agree to this transfer, storing and/or processing. We will take such steps as we consider reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

HOW LONG WE KEEP YOUR PERSONAL DATA?

The personal information data held by us and collected from you will be retained by us on our systems for as long as it remains useful in serving the purpose for which it was submitted and to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies. After such a period, your information will be deleted unless we are required to retain it further by law. We may also hold your data for longer periods with your consent where we have entered into a contract with you; we may retain your details in case we wish to contract with you again. Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service

In the case that you wish to cancel your registration as a user, once an account is deleted a red flag goes on the database and, while people cannot use the personal information, it stays on the system for a period of one year for administration purposes before being deleted automatically. Where you contribute to website, we will generally only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted. There may also be rare instances where we will share your contribution with third parties in the interests of maintaining historical archives. Where possible, we will endeavour to inform you upfront or let you know at a later date where we are likely to keep content indefinitely or pass it onto an approved historical archive.

WHAT ARE YOUR RIGHTS?

We may use the personal data you have given us to form a view on which of our other products, services or offers may be relevant for you and contact you about these ("**marketing communications**"). You may receive such marketing communications from us if you have requested information from us or purchased our services and you have specifically asked to receive that marketing. You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms (where applicable) or by contacting us.

In certain circumstances, you have additional rights under data protection legislation in relation to your personal data. In particular, you have the following rights:

- **The right to access, correct, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you;
- **The right to object.** You have the right to object to our processing of your personal information;
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information;
- **The right to complain.** You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority;
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format; and
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where you have given your consent and no longer wish to give your consent to the processing of your personal information.

Moreover, under the Data Protection Act you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you will use reasonable efforts to supply, correct or delete personal information about you on our files.

For international users accessing the website, all personal information submitted by you to the website goes directly to us and will be processed in accordance with this Privacy Policy unless terms on our website specify otherwise. You should note that we place a number of cookies on our website and may collect information about international users from this website.

Please address requests and questions about this or if you wish to exercise any of the rights set out above, please contact us at the provided address. Please note that we may ask you to verify your identity before responding to such requests. In fact, we may require you to prove your identity with 2 pieces of approved photographic identification.

LINKS TO OTHER SITES

Our website may contain, from time to time, hyperlinks to websites owned and operated by third parties, such as our suppliers, partner networks, advertisers, affiliates and other third parties. These third party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal information you submit or are collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use and operation of such websites, their content and policies is at your own risk.

CHANGES TO OUR PRIVACY POLICY AND KEEPING YOUR PERSONAL DATA UP TO DATE

We may update this privacy policy from time to time. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, we may notify you by e-mail, prior to the change becoming effective. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. The date of the most recent revisions will appear on this page. We endeavour to ensure that your personal information held by us is accurate, current, complete and up-to-date. Please notify us of any changes.

CONTACT US

If you have any enquiries, questions or wish to provide feedback about this Privacy Policy, including enquiries regarding exercise of your legal rights, are welcomed and should be addressed to us.