



Privacy policy

1. Introduction

1.1 We are committed to safeguarding the privacy of **Openbrolly** website visitors and service users for all our products and services, including **MovieSite, Crewshout, EventsMakr** Health SaaS etc.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of **Openbrolly** website visitors, application users and service users; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 **Openbrolly** asks you to consent to our use of cookies by using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy and our cookie policy.

1.4 In this policy, "we", "us" and "our" refer to **Openbrolly**. For more information about us, see Section 12.

2. How we use your personal data

2.1 In this Section we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

2.2 We may process data about your use of our website and services "**usage data**". The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent.

2.3 We may process information contained in any enquiry you submit to us regarding goods and/or services "**enquiry data**". The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent.

2.4 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters "**notification data**". The notification data may be



processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent

2.5 We may process information contained in or relating to any communication that you send to us "**correspondence data**". The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website

2.6 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

3.1 We may disclose your "correspondence data" to a third party of customer relationship systems known as Capsule CRM. The profile data collected may include your name, company address and company email.

3.2 We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.3 For our health systems "personal data" "profile data" "correspondence data" and "usage data" will be shared and stored within NHS Highland systems. For more information or to withdraw your data please contact the Interim data protection office: Donald Peterkin via email: donald.peterkin@nhs.net, or post to: NHS Highland, central records department, Raigmore hospital, Old Perth road, Inverness, IV2 3UJ.

4. International transfers of your personal data

4.1 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

5. Retaining and deleting personal data

5.1 This Section sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.



5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

Where you have given us consent, we will retain your information until you advise us that you no longer wish to receive information (which you can do at any time) or until we determine there is no further requirement to process your information or provide you with information.

Where we have a contract, we will retain your information until termination of that contract plus 6 months to allow us to close the contract effectively. You can ask us to remove your information earlier.

Where there is a public task, we will hold that information for as long as necessary to execute that task.

Where there is a necessary, legitimate interest we will retain and process your information for as long as necessary to safeguard our or a third party's interests, accepting your individual rights may override this.

5.4 Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We may notify you of changes to this policy by email.

7. Your rights

7.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at GBP 10); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).



7.2 We may withhold personal information that you request to the extent permitted by law.

7.3 You may instruct us at any time not to process your personal information for marketing purposes.

7.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

9.1 **Openbrolly** uses the following cookies on this website, for the following purposes:

- Strictly necessary cookies
- Performance cookies
- Functionality cookies

10. Cookies used by our service providers

10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. Information on the relevant cookies can be found here:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

11. Managing cookies



Openbrolly

Take your journey, under our umbrella

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

<https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

<http://www.opera.com/help/tutorials/security/cookies/> (Opera);

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

<https://support.apple.com/kb/PH21411> (Safari); and

<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on our website.

12. Our details

12.1 This website is owned and operated by **Openbrolly**.

12.2 We are registered in Scotland under registration number SC200302, and our registered office is at 64a Cumberland street, Edinburgh EH3 6RE.

12.3 You can contact us:

- (a) by post, to the postal address given above
- (b) by telephone, on the contact number published on our website
- (d) by email, using the email address published on our website

13. Data protection officer

Our data protection officer contact details are:

Samantha Hill

sam.hill@openbrolly.com