# **Implant Logbook Data Protection Policy**

This Data Protection Policy can also be found as part of the Terms of Use by clicking the Terms of Use link on the Website.

All defined terms within this Data Protection Policy shall have the meaning given within the Terms of Use, unless the context otherwise requires.

The ADI is committed to ensuring that your personal information is used properly and is kept securely. This Data Protection Policy explains how we will collect and use personal information through the Website.

Within this Data Protection Policy and the Terms **Data Controller**, **Data Processor**, **Personal Data and Processing (or Process or Processed)** shall have the meanings given in the DPA 1998 and **DPA 1998** shall mean the Data Protection Act 1998 as amended from time to time;

By submitting information to the Website, whether during the registration process or when posting Contributions, you are consenting to the processing of such information by us and our agents in accordance with this Data Protection Policy.

## **Collection of personal information**

The ADI collects the following information from you in order to register you as a user of the Website: [your name, age, email address, home address, ADI membership registration details]. You also provide us with a user name and password when you register ("Registration Data"). The ADI cannot register you as a user without this information.

The ADI also collects the following related information about you: IP address, aggregate user data and browser type ("Related Information").

All Contributions submitted to the Website by you are voluntary and may include personal information relating to your patients ("Patient Information"). You may upload Patient Information to the Website on your profile page, in the My Patients Section and New Patients Section only when you have informed the patient that you will use their Patient Information in this way and received their express consent. You may upload Patient Information on to the Shared Patients section and allow access to this Patient Information by other users only when the patient is also a patient of such user and both you and the other user have informed the patient and received the patient's express consent that their Patient Information shall be used in this way.

## **Use of Your personal information**

The ADI uses your Registration Data in order to register you as a user, to administer your use of the Website and to provide you with services available through the Website, such as messaging services. We also use your Registration Data in order to contact you by email with service-related announcements. The ADI may use your Registration Data to contact you about products and services that we think may be of

interest to you and to request your participation in surveys or other activities related to the ADI or other projects with which we are involved.

The ADI uses Related Information to manage and improve the Website and services available through the Website, to track and analyse usage of the Website and for security purposes.

A cookie is a piece of information that is held on the hard drive of your computer which records how you have used a website. The ADI uses cookies to accumulate useful information, such as whether the computer 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.

We use cookies to monitor how people use the Website in order to help us to provide you with a better service. Cookies make it easier for you to log on and use the Website during future visits. They also allow us to personalise the content of the Website for you.

If you do not want cookies downloaded onto your machine, you can disable them by adjusting the settings on your browser. However, you may not be able to use some of the features on the Website without cookies.

You control the purposes for which Patient Information is used on the Website, therefore you are the data controller in relation to Patient Information. We store Patient Information on your behalf but we will not use Personal Data contained in Patient Information for our own purposes. We will use your Contributions only as stated in this Data Protection Policy and the section on "How the ADI will use your Contributions" in the Terms of Use.

## **Sharing Your Personal Information**

The ADI may share your personal information with third parties in the following ways:

The ADI may sometimes use third parties to process personal information on our behalf. For example, to host the Website and to maintain our IT systems. Where we use a third party to process your personal information on our behalf, we will ensure that they have adequate security measures in place to safeguard your personal information.

The ADI will release your personal information when we are required to do so for legal or regulatory purposes or as part of legal proceedings.

The ADI may give information we hold about you to third parties as part of the process of selling our business.

In some circumstances we may transfer your personal information to countries outside of the European Economic Area, where data protection safeguards are not as high as they are in the UK. If this occurs we will ensure that adequate measures are taken to protect your personal information.

## **Patient Data**

You agree and acknowledge that you have informed your patients and obtained the express consent of your patients to upload Patient Information on to the Website and where appropriate, share such Patient Information with other users and you agree to indemnify and keep indemnified the ADI from and against all costs, expenses (including, but not limited to, legal and other professional fees and expenses) losses, damages and other liabilities suffered or incurred by the ADI and arising out of or in connection with a breach of the DPA 1998 by you.