

Privacy Policy

Pinpoint Innovations respects your right to privacy and we have adopted this privacy policy to explain:

- what information may be collected through the Pinpoint Innovations website (including any sub-domains eg tracworx.com),
- what information may be collected through the use of or participation in our services
- how this information may be used and/or shared with others,
- how we safeguard it and how you may access and control its use.

Please read this Privacy Policy carefully, because by using this Site and/or our Services, you are acknowledging that you understand and agree to the terms of this Privacy Policy.

Information We Collect

When you visit this Site and/or use our services, we may collect certain types of information from you, including personal data, including information that you, your computer, or your devices (including mobile devices) voluntarily provide via forms, surveys, applications and through the use of or participation in various services.

Using the Google Analytics Service, we may also collect information about you from your online browsing and transactions, including your preferences, pages visited, technical information regarding your computer, devices and operating systems.

For further information on Google Analytics Privacy Policy, please follow this link :

<https://www.google.com/analytics/learn/privacy.html?hl=en-GB>

Information You Provide

In certain circumstances, you may be asked to provide some specific information about yourself in order to use certain features on this Site and/or the Service or to take advantage of certain opportunities that we may offer through this Site and/or the Service. For example, we may collect personal contact, billing and credit information when you register with Pinpoint Innovations.

Information Collected

Primarily, the information we collect is :

- Contact E-mail address
- Contact Phone number
- Name
- Address
- Organisation you belong to

In order to process payments associated with our products or services we will be required to collect the following information:-

- Credit Card/Debit Card details

Information Collected :

We and our authorised third party service providers collect certain information, some of which may be personal data, whenever you use our site or services. For example, using Google Analytics, when your computer web browser or other communication device (including phone, PDA, etc.) accesses our Site, we automatically receive certain information, such as your device ID or unique identifier, device type, unique device token, referring domains, language, IP address, browser type, date and time, and the web page you visited before visiting our Site. This statistical data provides us with information about the use of this Site, such as how many visitors visit a specific page on this Site, how long they stay on that page and which hyperlinks, if any, they “click” on. We collect this information through the use of technologies such as “cookies”, “web beacons” and “IP addresses”, which are discussed in greater detail below.

We collect information in order to determine which areas of this Site are most popular and to enhance this Site for visitors.

We may also collect aggregate metadata concerning your activity on the website. We will use this aggregate data to provide you with our services, improve our services and improve our general marketing efforts related to the services. We may group this information into aggregate data in order to describe the use of this Site and/or our services to our existing or potential business partners, sponsors, advertisers or other third parties, or in response to a government request.

However, please be assured that this aggregate data will in no way personally identify you or any other individuals.

- **IP Addresses**

An IP address is a unique number assigned to your computer when it accesses the Internet or another computer network. Web servers and network devices identify your computer automatically by its IP address. We collect IP addresses for purposes of system administration, to report aggregate information to our advertisers, and to track the use of this Site. When a visitor requests pages from this Site, our servers log the visitor's IP address. It is not our practice to link IP addresses to anything personally identifiable, which means that a visitor's session will be logged, but the visitor remains anonymous to us. However, we reserve the right to use IP addresses to identify a visitor only when we feel it is necessary to enforce compliance with this Site's policies or to protect our services, members, this Site or others.

- **Cookies**

Cookies are pieces of information that a website transfers to a device accessing the Internet. We or our service providers may use both session ID cookies and persistent cookies on our Site or the pages we use to deliver our Services to you. A session ID cookie expires when you close your browser. A persistent cookie remains on your device for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. You can learn more about cookies at allaboutcookies.org.

On our Site, we use session cookies to make it easier for you to navigate the Site by saving your preferences and to improve and track the overall Site experience. For our Site, we set a

persistent cookie to determine your language and country so we can provide you with relevant content. If you reject cookies, you may still use our Site, but your ability to use some areas of our Site may be limited.

Cookies and similar files do not contain or capture unencrypted personally identifiable data. For many cookies, you may disable our placement of cookies on your device.

- **Web Beacons**

Web beacons are small graphic images (also known as "pixel tags" or "clear GIFs") that may be included on our sites, services, applications, messaging, and tools, that typically work in conjunction with cookies to identify our users and user behaviour. Web beacons tell our advertising service providers the Internet address of the Site pages viewed by users, browsing patterns within the Site, and responses to advertisements and promotions on the Site.

Pinpoint Innovations Devices

Pinpoint Innovations works with medical practitioners and hospitals to assist them in gathering administrative and efficiency information which allows better decision making in the perioperative process.

In terms of your data, the medical practice or hospital is the Data Controller – Pinpoint Innovations does not have any access to the personal or sensitive data associated with patients of our hospital customers.

Device Description

The device that Pinpoint Innovations manufactures is an intelligent wearable device that tracks both patient and equipment locations throughout the whole perioperative journey. When this information is correlated with specific data to each individual case, it identifies trends and records key performance indicators of a theatre. This provides hospitals and staff instant data in a simple and easy to use application. The system can be used to demonstrate areas of inefficiencies, pinpoint where improvements can be made and ultimately deliver better patient care.

It is essentially a sensor device that tells the hospital staff it's location within the building. It is similar to an indoor GPS – by using the hospital wifi signal strength the device can be located at any time within that building only.

If you use our devices in the process of your treatment at the hospital, you will have signed consent forms with that hospital. As well as adhering to our own policies, Pinpoint Innovations has signed agreements binding us to conform with the data protection, privacy and confidentiality policies and procedures of the hospital.

Your personal data is not shared with Pinpoint Innovations through these devices.

Use of Information

Any information you submit on this Site and/or through our Services will be used for a variety of business purposes, including for example, to :

- complete transactions and bill for Services;

- provide you with our Services;
- verify your identity;
- respond to your requests for service or assistance;
- anticipate and resolve actual and potential problems with our Services;
- create and improve Services;
- contact you, either via email, telephone or otherwise as authorised by you to answer questions, resolve disputes and troubleshoot problems with your account, product or our Services;
- suggest additional or different Services;
- make internal business decisions about current and future offers;
- provide personalised service and user experiences;
- protect our rights and property; prevent, detect, and investigate fraud, security breaches, potentially prohibited or illegal activities
- and as otherwise disclosed at the point where such information is collected or in any additional terms and conditions applicable to the particular feature of this Site and/or the Services.

Information Sharing

The primary third party with which we share your information is Hubspot.com in order to record, administer and fulfil the service.

Your personal data may also be used by us or shared with our subsidiaries, affiliates, sponsors, partners, advertisers or other third parties to provide you with services, product information and promotional and other offers.

However, in order to carry out your requests, to make various features, services and materials available to you through this Site, to respond to your inquiries, and/or to provide our Services to you or enable our third party service providers to provide Services to you, we may share your personal data with other providers. Such third parties are companies or individuals that perform functions on our behalf (or on behalf of our partners), such as companies or individuals who analyse data, provide customer service or other services, advertisers, sponsors or other third parties who participate in or administer our promotions or provide marketing or promotional assistance (but such information will be shared only to the extent they need such information to perform their functions). These service providers may use these technologies to help us deliver our own content and advertising, and compile anonymous site metrics and analytics. We do not permit any of these service providers to collect any of your personal information on our sites or in our services, applications, or tools for their own purposes. These service providers are subject to confidentiality agreements with us and other legal restrictions on their use or collection of any personal information.

We may use third parties, such as advertising networks and exchanges, to allow us to serve you advertisements. These third-party ad networks and exchange providers may use third-party cookies, web beacons, or similar technologies to collect information. They may also collect your device identifier, IP address, or identifier for advertising (IDFA). The information that these third parties collect may be used to assist us in providing you with more relevant advertising that we

serve on our sites or elsewhere on the web.

For more information on third-party advertising-related cookies and how to opt-out of them, please visit one of the following third party websites:

Hubspot.com

Google Analytics

Facebook Pixel

Your Online Choices? The Self-Regulatory Program for Online Behavioral Advertising (available in English only) Network Advertising Initiative Consumer Opt-Out (available in English only)

Some of the aggregate or personal data that Pinpoint Innovations receives is collected through third party Services that are available through our Services. In these cases the third party service provider will require you to sign up for the applicable service offering and will include a link to the relevant privacy policy that applies to such collection (i.e. this Pinpoint Innovations Privacy Policy or the third party's privacy policy). We may allow you to share information with third party social media sites, or use social media sites or other sites to create or connect to your account. Those social media sites may give us access to certain personal information stored by them (e.g., content viewed and information about the advertisements within the content you have been shown or may have clicked on, etc.) from your interaction with the online services. Remember that you control the personal information you allow us to have access to through the privacy settings on that third party site and the permissions you give us when you grant us access.

We reserve the right to disclose any personally identifiable or non-personal data if we are required to do so by law or if we reasonably believe that such action is necessary in order to:

- (a) fulfil a government request;
- (b) conform to the requirements of the law or comply with any legal process served on us;
- (c) protect or defend our legal rights or property, this Site or our Services, or its users; or
- (d) in an emergency, protect the health and safety of this Site's users or the general public.

Except as provided in this privacy statement, your personal data will not be provided to any third parties without prior approval from you.

Choice and Access

You may always direct us not to share your personal data with our third party service providers, not to use your personal data to provide you with information or offers, or not to send you newsletters, emails or other communications by:

- sending us an email at fionn.barron@pinpointinnovations.com;
- contacting us by post at Pinpoint Innovations, Nexus Innovation Centre, Tierney Building, University of Limerick, Limerick.
- following the removal instructions in the communications that you receive.

Your opt-out request will be processed within 14 business days of the date on which we receive

it.

Removing your personal data may limit our ability to inform or provide our services to you.

We make good faith efforts to provide you with access to your personal data and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardise the privacy of others, or would be extremely impractical, or for which access is not otherwise required.

Advertising

Pinpoint Innovations advertises on pages within the Site as well as on other websites not affiliated with Pinpoint Innovations. We contract with advertising service providers who serve advertising to you through the use of technologies, such as cookies and web beacons.

Behavioural Information/Targeted Marketing

We also use advertising service providers to help us determine which of our advertisements are most likely to be of interest to you while you are on the Site. These advertising service providers may use anonymous behavioural information, such as how you navigate the site, to provide relevant advertisements to you while you are on Pinpoint Innovations websites. These advertising service providers do not have access to, or collect, personal data, such as your name, address, email address, account number or telephone number.

If you prefer not to have anonymous behavioural information used in this way, set your browser to not accept cookies, but doing so may cause you to experience some inconvenience in your use of the Site, as described above.

Advertising on Other Websites

Pinpoint Innovations contracts with advertising companies to advertise our accounts and Services on websites not affiliated with Pinpoint Innovations. If you click on one of our ads, you link to the third party website that offers the advertised account or Services. These ads may contain cookies that allow tracking of your response to our advertisements. These cookies do not identify you personally.

Pinpoint Innovations' advertising service providers, such as Google, Yahoo! or MSN/Microsoft, may offer a way to opt out of targeted advertising based on the use of their cookies. In addition, if you prefer that our advertising service providers not know which Pinpoint Innovations website pages you have viewed, visit the Network Advertising Initiative site:

<http://www.networkadvertising.org> to opt out of ad targeting from participating companies. In order for the opt-outs to work on your computer, your browser must be set to accept cookies. If you delete cookies, buy a new computer, access the Site from a different computer, log in under a different screen name, or change web browsers, you will need to opt out again. If your browser has scripting disabled, you do not need to opt out, as behavioural marketing technology does not work when scripting is disabled. Please check your browser's security settings to validate

whether scripting is active or disabled.

Alternatively, if you prefer not to have anonymous behavioural information used in this way, set your browser to not accept cookies, but doing so may cause you to experience some inconvenience in your use of the Site.

Keeping Your Information Secure

We have reasonable security measures in place to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we strive to protect your personal data and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction, or inadvertent disclosure of your personal data.

If you have registered on this Site, or our Services, access to your account will be protected by your password. We recommend that you do not disclose your password to any other person. You are solely responsible for maintaining the confidentiality of your password and account, and are fully responsible for all activities that occur under your password or account.

Other Sites and Third Party Services

This Site may contain links to other websites that we do not control or maintain. We encourage you to note when you leave this Site and to read the privacy statements of such other websites before submitting any personal data. Additionally, if you access a third party branded service through an API or otherwise, you are solely responsible for understanding, agreeing to and complying with the third party service terms and conditions of use and privacy policy. Pinpoint Innovations is not responsible for the privacy policies or security of third party websites and/or services.

Contacting Us Withdrawal of Consent, Access & Correction of your Personal Data

If you:

- have questions or comments about our Privacy Policy
- have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- would like to obtain access & make corrections to your Personal Data records,

please contact the Fionn Barron, who has responsibility for Data Protection in Pinpoint Innovations, by :

- sending us an email at fionn.barron@pinpointinnovations.com;
- contacting us by post at Pinpoint Innovations, 45 Clare Street, Limerick.

Changes to this Privacy Policy

Due to the Internet's rapidly evolving nature and/or as required by law or regulatory change, Pinpoint Innovations may need to update this Privacy Policy from time to time. If so, Pinpoint Innovations will post its updated Privacy Policy on our Site. Pinpoint Innovations may also send

registered users of our Services a notice that this Privacy Policy has been changed. Pinpoint Innovations encourages you to review this Privacy Policy regularly for any changes. Your continued use of this Site and/or our Services and/or your continued provision of personal data to us after the posting of such notice will be subject to the terms of the then-current Privacy Policy.