



Jenx Limited Privacy Policy

This privacy policy sets out how Jenx Limited uses and protects any personal data with regard to the collection, storage, access and processing of such information under EU Regulation 2016/679, commonly known as the General Data Protection Regulation (“GDPR”).

Jenx Limited are committed to ensuring that your privacy is protected. We are committed not only to the letter of the law, but also to the spirit of the law. We place the highest importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals we deal with.

In Brief

Personal data is information that can be used to help identify an individual, such as name, address, phone number or email address.

Jenx Limited is required to process the personal data of individuals (also known as “data subjects”) as part of its business practices. Individuals can include (but are not limited to) customers, suppliers, business contacts, clients and any other individuals we have a direct or indirect relationship with.

While it’s important that you read this policy to understand what information we collect, how we may use it, and what your rights are – we understand that you may not have time right now to, so we’ve added this quick summary:

- We collect information about customers, suppliers, business contacts, clients and any other individuals we have a direct or indirect relationship with
- We collect information to provide services or goods, to provide information, for administration, research, analysis, and for the establishment and defence of legal claims.
- We only collect the information that we need or that would be useful to us in our quest to provide the best possible service.
- We never sell your data and we will never share it with another organisation for marketing purposes.
- We only share data where we are required to do so by law or with carefully selected partners who do work for us. All partners are required by their contract to treat your data as carefully as we would, to only use it as instructed, and to allow us to check that they do this.

That's our policy in brief, please read the full policy and if you have any questions about privacy or how we process your data you can direct these to our Data Control Officer Daniel Thomas by emailing DataControl@Jenx.com. Our full data protection policy including information classification and handling standards is available on request: DataControl@Jenx.com

Links to other websites from the Jenx Limited website

Our website contains links to other websites of interest. However, once you have used these links to leave the Jenx Limited site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Cookies on the Jenx Limited Site

Cookies are used to track information for Google Analytics and for the Content Management System to enable Jenx Limited website administrators to optimise the site and its content and provide the most valuable information and resources we can to our customers.

Terms of Use of the Jenx Limited Website and Information Therein

All case history information on the Jenx Limited website may be downloaded and/or printed provided:

- It is only for personal or professional use (you are a parent/carer or professional seeking information about the use of a piece of equipment)
- The case history is not changed in any way
- Images must not be separated from accompanying text
 - Further written consent MUST be sought if:
 - Information is to be used by Jenx Limited's business partners for commercial purposes (marketing brochures, website, advertising etc.)
 - The format of the case history is changed, for example making your own version to present to colleagues
 - The case history is to be translated

If you would like to use the case history information in one of the ways above, please contact us by email on contact@jenx.com stating which case(s) you wish to use, and attach a draft of your

proposed format. Please give as much detail as possible to allow the families to make an informed decision.

Jenx Limited and Direct Marketing

Jenx Limited operates an 'Opt-in only' communication policy with regards to direct marketing. At the point where we collect your data, you will be asked if you want to receive direct marketing content from Jenx Limited.

You may object to any direct marketing you receive from Jenx Limited at any time. Where Jenx Limited receives an objection to direct marketing, we will cease all processing of your personal data for these purposes regardless of time, and without delay or charge.

If you opt in to receive marketing communication, we collect information surrounding how you use our marketing email communication - for example whether you open them and which links you click on.

We have no grounds to refuse or challenge an objection to direct marketing.

You can make your request by calling us on +44(0)114 2853376 or by emailing Hello@jiraffe.org.uk

Your Rights

The General Data Protection Regulation provides data subjects with the following rights

- (a) The right to be informed
- (b) The right of access
- (c) The right to rectification
- (d) The right to erasure ('the right to be forgotten')
- (e) The right to restrict processing
- (f) The right to data portability
- (g) The right to object
- (h) Rights in relation to automated decision making & profiling

Jenx Limited welcomes these rights and will comply in all capacities to fulfil our obligations as set out below.

The Right to be Informed

Jenx Limited will only collect and process personal data for and to the extent necessary for the specific purpose or purposes set out below.

Description of Data	Types of Data Processed	Collection/Storage Point	Purpose(s)	Description	Basis for processing	Disposal Point
Personal Information	<ul style="list-style-type: none"> • Name • Address • Email • Personal Contact Details • Voice Recording 	<ul style="list-style-type: none"> • Jenx Customer Database(s) • Jenx IT Network Files • Email • Paper Files • Recorded Telephone Calls 	<ul style="list-style-type: none"> • Contract / Negotiations 	Where the data is necessary for the performance of a contract to which the data subject is party or; the data is being processed with a view to the Data Subject entering into a contract with Jenx Limited.	<ul style="list-style-type: none"> • Contract 	Current Year +6
		<ul style="list-style-type: none"> • Jenx Customer Database(s) • Jenx IT Network Files • Email • Paper Files • Recorded Telephone Calls 	<ul style="list-style-type: none"> • Aftersales Support Cases • Customer Enquiries • Complaints 	Information is gathered on the preferences and experiences of our customers to better understand where we as a business can make improvements. Personal Data is collected to record these interactions within an individual's file and to respond to customers who's feedback warrants a reply or where a reply is requested	<ul style="list-style-type: none"> • Legitimate Interests • Legal Claims 	Current Year +6
		<ul style="list-style-type: none"> • Jenx Customer Database(s) • Jenx IT Network Files • Email • Paper Files • Recorded Telephone Calls 	<ul style="list-style-type: none"> • Direct Marketing 	Where consent is provided, Data Subjects will receive marketing communication from Jenx Limited on a regular basis focused around products, competitions, clinical research and news items. The communication delivered is perceived to be of genuine interest to the contact and is focussed around Jenx Limited activity.	<ul style="list-style-type: none"> • Consent 	Removal of Consent
		<ul style="list-style-type: none"> • Jenx Website • Jiraffe Website • Survey Monkey 	<ul style="list-style-type: none"> • Opinion / Preference 	Information is gathered on customers preferences and experiences to better understand where we as a business can make improvements. Personal Data is collected to respond to customers who's feedback warrants a reply	<ul style="list-style-type: none"> • Legitimate Interests 	12 months
Financial Records	<ul style="list-style-type: none"> • Name • Address • Email • Personal Contact Details • Voice Recording 	<ul style="list-style-type: none"> • Jenx Customer Database(s) • Jenx IT Netork Files • Paper Files 	<ul style="list-style-type: none"> • Contractual 	Personal Data is processed where the data is necessary for the performance of a contract to which the data subject is party.	<ul style="list-style-type: none"> • Contract 	Current Year +6

CCTV Footage	• CCTV Footage & Images	• Jenx Network	• Security • Health and Safety • Establishment, exercise or defence of legal claims	CCTV is present on both sites for the health, safety and security of staff and visitors and the establishment, exercise and defence of legal claims where applicable.	• Legitimate Interests • Legal Claims	Current Year +6
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The Right to Access

Jenx Limited welcomes the rights of individuals to access information as set out in the General Data Protection Regulation. We are committed to operating openly and we will meet all reasonable requests for information without charging a fee.

If you wish to make a request for access please contact our Data Control Officer by emailing DataControl@Jenx.com by calling +44(0)114 2856 116 or in writing to:

Data Control
Jenx Limited
3 Wardsend Road
Sheffield
S6 1RQ

The Right to Rectification

Jenx Limited is committed to the ensuring the accuracy of the data we hold. Under regulations, data subjects hold the right to have any inaccurate data rectified or erased without delay.

If you wish to make a request for rectification please contact our Data Control Officer by emailing DataControl@Jenx.com by calling +44(0)114 2856 116 or in writing to:

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3 Wardsend Road
Sheffield
S6 1RQ

The right to Erasure

Under the General Data Protection regulation Data Subjects hold the right to have their personal data erased. This is also known as ‘the right to be forgotten’. This right is not absolute and is only applicable in certain circumstances.

You have the right to erasure if:

(a) the personal data is no longer required for the purpose(s) which we collected or processed it

(b) we are relying on the lawful basis of consent for holding the data and consent is removed

(c) we are relying on the lawful basis of legitimate interests to process the data, you object to the processing and we have no overriding legitimate interest to continue this processing

(d) we are processing the data for direct marketing purposes and you object to this processing

(e) we have processed the data unlawfully

(f) it is a requisite for legal compliance that we do so

(g) we have processed the data to offer services to a child.

If you wish to make a request for erasure please contact our Data Control Officer by emailing DataControl@Jenx.com by calling +44(0)114 2856 116 or in writing to:

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Sheffield
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The Right to Restrict Processing

The right to restrict processing gives individuals the ability to limit the way Jenx Limited uses their data and presents an alternative to erasure.

You may request the restriction of processing due to issues within the information we hold about you or if you have an issue with how we have processed your data. In most cases, restrictions on processing are not required to be indefinite, but they will need to be in place for a certain amount of time and only lifted once we have notified you.

If you wish to make a request for restriction please contact our Data Control Officer by emailing DataControl@Jenx.com by calling +44(0)114 2856 116 or in writing to:

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Sheffield
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The Right to Data Portability

This right allows you to obtain and reuse personal data for your own purposes across different services. This right entitles you to move, copy or transfer personal data from one IT environment to another without hindrance to usability.

This right only applies:

- (a) to personal data you have provided to us
- (b) where processing is based on consent or the performance of a contract; and
- (c) when processing is carried out by automated means.

Where requests are granted Jenx Limited will provide data in an open and commonly used machine readable format which allows the data to be used by other organisations.

Where requested (and technically feasible) we will transmit the data directly to another organisation/data controller.

If you wish to make a request for portability please contact our Data Control Officer by emailing DataControl@Jenx.com by calling +44(0)114 2856 116 or in writing to:

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The Right to Object

This right gives you the ability to object to specific processing activities carried out by Jenx Limited. Unlike the right to restriction, objections are usually permanent in nature.

You have the right to object to:

- (a) direct marketing (including profiling) in all forms
- (b) processing for purposes of scientific/historic research and statistics
- (c) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)

Where Jenx Limited receive an objection to processing for purposes of direct marketing, Jenx limited will cease all processing of the subjects personal data for those purposes regardless of time, and without delay or charge. We have no grounds to refuse or challenge an objection to processing for the purposes of direct marketing.

If you wish to object to processing activities please contact our Data Control Officer by emailing DataControl@Jenx.com by calling +44(0)114 2856 116 or in writing to:

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Sheffield
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Rights in relation to automated decision making & profiling

Jenx Limited does not use automated decision making (including profiling) in any of its current practices.

Jenx Limited will undertake a thorough Data Protection Impact Assessment, including a review of this policy prior to engaging in any automated decision making or automated profiling activities.

If you have any questions please direct them to our Data Control Officer by emailing DataControl@Jenx.com by calling +44(0)114 2856 116 or in writing to:

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Jenx Limited
3 Wardsend Road
Sheffield
S6 1RQ

Complaints

You can contact us directly with any concerns or complaint Officer by emailing DataControl@Jenx.com by calling +44(0)114 2856 116 or in writing to:

Data Control
Jenx Limited
3 Wardsend Road
Sheffield
S6 1RQ

Alternatively you can contact the Information Commissioners Office by phone on 0303 123 1113 or by visiting their website <https://ico.org.uk>

Data Breach Notification

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of Individuals (“data subjects”) (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), Jenx Limited has place policy and procedural measures to inform the Information Commissioner’s Office of the breach without delay, and in any event, within 72 hours of Jenx Limited becoming aware of it.

In the event that a personal data breach is likely to result in a high risk (higher than stated above) to the rights and freedoms of individuals, Jenx Limited will ensure that all affected are informed of the breach directly and without undue delay.