

Effective Date: 03-Nov-2025

1. Introduction

JRI ORTHOPAEDICS ("we", "us", "our") are committed to protecting and respecting your privacy.

This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you visit our web-based ICOS platform (the "Platform") for managing custom medical device cases. Please read it carefully.

We are registered in England and Wales, under company number 00976297, with our registered office at 18 Churchill Way, 35a Business Park, Chapeltown, Sheffield, S35 2PY.

We are the data controller under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The following definitions apply in this Policy:

User: means you, as a user of our Platform;

Patient: means your patient.

2. Personal Data We Collect

We may collect and process the following types of personal data – this is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed:

A. User Personal Information

- Name
- Email address
- Phone number
- Job title
- Organisation/employer

B. Patient Health and Medical Information

- Case notes and history
- Diagnostic imaging data including, but not limited to, radiographic (X-ray), magnetic resonance imaging (MRI), computed tomography (CT). These data may be stored in DICOM or other standard formats and may include embedded metadata (e.g.,

timestamps, device identifiers, patient IDs).

- Medical records (as necessary for case tracking)

You confirm that you have the consent of the Patient to disclose and transmit their personal data on the Platform.

C. User Technical Data

- IP address
- Browser type
- Operating system
- Usage and browsing activity

D. User Communication Data

- Messages, support queries, or feedback

3. How We Collect Data

- Directly from the User (e.g., account registration, support queries, inputting of Patient health and medical information)
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- Automatically through your use of the Platform

4. How We Use the Data

We process personal data for the following purposes:

- To provide and manage access to the Platform
- To facilitate the design and manufacture of custom-made medical devices, and the management and tracking of these cases
- To maintain accurate medical device logs and support clinical outcomes
- To respond to queries and technical support requests
- To improve our services and platform functionality
- To comply with legal obligations

We will only use the personal data when we have a lawful basis to do so, including User consent, performance of a contract, compliance with a legal obligation, or legitimate interests.

5. Sharing Your Data

We may share your data with:

- Our service providers (e.g., hosting, analytics), who may be based in third countries
- Regulatory bodies (if legally required)
- Legal authorities (when legally necessary)

6. AI and Machine Learning

We do not use the personal data to train artificial intelligence (AI) or machine learning models.

Any data you provide to us is used solely for the purposes stated in this Privacy Policy (such as providing services, processing transactions, or customer support), and it is never repurposed or shared for AI training or automated decision-making outside of what is necessary to provide our services.

We are committed to safeguarding the personal information and ensuring it is not used in a way that you would not reasonably expect.

7. Data Security

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- End-to-end encryption
- Role-based access controls
- Secure UK-based data hosting

8. Data Retention

We retain the personal data only for as long as necessary to fulfil the purposes we collected it for, including to meet legal, regulatory, or reporting obligations.

9. Your Rights

Under UK data protection law, you have the right to:

- Access the personal data we hold about you
- Request correction of inaccurate data
- Request erasure of your data (in certain circumstances)

- Object to or restrict processing
- Data portability
- Withdraw consent (where consent was the legal basis)

To exercise these rights, contact us at: ICOS@jri-ltd.co.uk

10. Transfers Outside the UK

We may be required to transfer data outside the UK (to India); when doing this we ensure appropriate safeguards are in place, such as International Data Transfer Agreement and Transfer Risk Assessment. Data will only be transferred outside of the UK if deemed absolutely necessary.

10. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse the site and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site.

11. Updates to This Policy

We may update this Privacy Policy occasionally. Material changes will be notified by email or platform notice. Your continued use of the Platform after changes take effect constitutes acceptance of the revised Terms of this policy.

12. Contact Us

If you have any questions about this Privacy Policy or your personal data, please contact our Data Protection Officer at:

Rachel Abbott

Email: rachel.abbott@jri-ltd.co.uk

Phone: +44 114 257 3200

Address: 35A, Business Park, 18 Churchill Way, Chapeltown, Sheffield S35 2PY

You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO): <https://ico.org.uk/>