



Privacy Statement

Trasna (trading name of Oases Health Horizons Ltd) is committed to protecting your privacy and ensuring that your personal data is protected at all times and accordingly processing of such data is carried out in line with our obligations under the General Data Protection Regulation (GDPR) (EU) 2016/679 (“**GDPR**”) and the Data Protection Acts 1988-2018 (collectively referred to as “**the DPA**”).

This statement sets out how we, as a data controller, collect and process personal data about:

- visitors to our website;
- individuals who we communicate or interact with in the course of our business;
- individuals whose personal data is provided to us in connection with the provision of our services;

And includes information collected via our website and/or our call centre. Reference to our "website" includes this website, all our associated sites (such as our knowledge sites and blogs) and our social media pages.

Where you are a customer/patient of Trasna, your personal data will be processed in accordance with the privacy terms set out in the Data Protection Consent Form which would have been furnished to you at the outset of your engagement with us, a copy of which can be found www.trasna.com

This statement also sets out information about data subject rights in line with our obligations under the DPA.

1. INFORMATION THAT WE COLLECT

The information we collect about you will depend on the nature of our engagement with you. Generally, we will only process personal data about you that you provide to us, whether voluntarily or in response to a request from us for information.

Ordinarily the information we collect includes your name, address, date of birth, contact details (telephone/email address) and any other information you provide to us. If you are a prospective customer/patient, we would also collect information such as your citizenship information and health data regarding your medical condition, the treatment required, treatment/diagnostics to date and any other relevant medical data which may influence the proposed treatment for example the presence of infectious diseases or blood borne viruses.

Where you visit our website, we may also automatically collect the following information:

- technical information, including cookies, the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and

version, time zone setting, browser plug-in types and versions, operating system and platform;

- (information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the Site and/or the Portal (including date and time), properties you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

You will not be personally identifiable from the information we collect about you as set out above and Trasná do not combine information collected in this way with any personally identifiable information for the purposes of identifying website users.

Cookies

The Website uses cookies to distinguish you from other users. A cookie is a small data file that may be sent to and/or stored on your browser which helps us to provide you with a good experience when you browse the Site and Portal and also allows us to improve these domains. Cookies usually do not identify you personally. By using the Website, you consent to whatever cookies we may send to you, but if you do not wish to receive any cookies, you can set your browser to (1) not accept cookies; or (2) to ask whether or not to accept a cookie, each time you receive a cookie.

2. HOW WE COLLECT AND USE PERSONAL DATA

Trasná will only use personal data for the purpose of facilitating and otherwise in connection with carrying out its day to day business of arranging healthcare for its customers. This includes collecting information, responding to enquiries, providing general information and making contact with our affiliated healthcare providers or other trusted professional support service providers.

3. THE BASIS ON WHICH WE RELY TO PROCESS YOUR PERSONAL DATA

We will process your personal data:

- On the basis of your consent, to provide you with information, products and/or services that you have requested from us;
- In certain circumstances, to carry out our obligations arising from any contracts entered into between you and Trasná;
- In compliance with a legal obligation to which we are subject;
- On the basis that we have a legitimate interest in the promotion, sustainability and growth of our business, to provide you with general information in relation to the sector and/or to notify you of any changes to our services that might affect you and/or to utilise our trusted professional support service providers; and/or
- To ensure that content from the Website is presented in the most effective manner for you and for your computer.

4. DISCLOSURE OF YOUR INFORMATION

We may disclose personal data to:

- third parties who provide a service to us;
- a public authority in the event that we are required to do so by law;
- a third party where we are under a legal obligation to transfer it to that third party;
- a prospective seller or buyer of any of our assets or business; and/or
- a third party where it is necessary to protect the vital interests of the data subject or another natural person.

To the limited extent that it is necessary to transfer personal data outside of the EEA, we will ensure appropriate safeguards are in place to protect the privacy and integrity of such personal data, including standard contractual clauses under Article 46.2 of the GDPR. Please contact us if you wish to obtain information concerning such safeguards (see Contact Us below).

5. LINKS TO OTHER SITES

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and we do not accept any responsibility or liability for the data processing operations of such websites. Please check those policies before you submit any personal data to those websites.

6. DATA SUBJECT RIGHTS

To the extent that we are a controller of your personal data you have a number rights as set out below. In each case, these rights are subject to restrictions as laid down by law.

The following is a summary of your rights:

- The right of access enables you to receive a copy of your personal data;
- The right to rectification enables you to correct any inaccurate or incomplete personal data we hold about you;
- The right to erasure enables you to ask us to delete your personal data in certain circumstances;
- The right to restrict processing enables you to ask us to halt the processing of your personal data in certain circumstances,
- The right to object enables you to object to us processing your personal data on the basis of our legitimate interests;
- The right to data portability enables you to request us to transmit personal data that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible;
- The right to withdraw your consent means we can no longer process personal data in relation to which we are relying on your consent to process.

If you wish to exercise any of these rights, please contact us (see Contact Us below). We may request proof of identification to verify your request. We have the right to refuse your request where there is a basis to do so in law, or if your request is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest.

You also have the right to lodge a complaint with the Data Protection Commission if you consider that the processing of your personal data infringes the DPA.

7. SECURITY AND WHERE WE STORE YOUR PERSONAL DATA

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access and use. As effective as modern security practices are however, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organisation. We will continue to revise our policies and implement additional security features as new technologies become available.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our website. Any transmission of personal data via the internet is at your own risk. Once we receive your personal data, we use appropriate security measures to seek to prevent unauthorised access or disclosure.

8. HOW LONG WE KEEP YOUR DATA

Trasna will generally only retain your personal data for as long as necessary to fulfil the purposes for which it was collected. This will be longer in some instances than others.

In some circumstances it may be necessary to retain your personal data for longer than the purpose for which it was collected for example to comply with any relevant legal requirement or where we believe it is necessary to retain the information for longer for example to allow us to defend an actual or anticipated legal claim.

We will securely delete your personal information when it is no longer required.

9. CHANGES TO THIS PRIVACY STATEMENT

We reserve the right to change this statement from time to time at our sole discretion. If we make any changes, we will post those changes here and update the "Last Updated" date at the bottom of this statement. However, if we make material changes to this statement, we will notify you by means of a prominent notice on the website prior to the change becoming effective. Please review this statement periodically for updates.

10. CONTACT US

Questions, comments, requests and complaints regarding this statement and the personal data we hold are welcome and should be addressed to info@trasna.com or by writing to Trasna, Fitzwilliam Street Upper, Dublin 2. All requests will be dealt with promptly and efficiently.

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