

REBEL BIONICS LTD DATA PRIVACY POLICY



Rebel Bionics Ltd is committed to protecting the privacy and personal data of our customers, employees, partners, and all other individuals we interact with.

As a UK-based medical device manufacturer, we understand the importance of handling personal information in a lawful, fair, and transparent manner.

This policy explains how we collect, use, store, and share personal data, and outlines your rights in relation to the data we hold.

Scope

This policy applies to all personal data processed by Rebel Bionics Ltd, whether it relates to customers (including end-users of prosthetics), employees, suppliers, contractors, or website visitors. It covers all processing activities conducted in the context of our business operations.

Legal Framework

We process personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Other relevant laws and regulations, including those related to medical devices and health data where applicable

Data We Collect

We may collect the following types of personal data:

Customer and User Data: Name, contact details, anatomical data (when necessary for product configuration) and product usage data.

Employee Data: HR records, payroll information, emergency contacts, qualifications, performance reviews.

Supplier and Partner Data: Business contact details, bank account information, correspondence records.

Website and Communication Data: IP address, browser type, location data, contact form submissions, marketing preferences.



How we use your data

We collect and use personal data for the following purposes:

- To design, configure, and deliver custom prosthetic devices
- To provide customer support and aftercare
- To comply with medical regulations and traceability requirements
- To manage employee relations and internal HR processes
- To maintain contractual relationships with suppliers and partners
- For marketing communications (where consent is given)
- To monitor and improve our website and services

Lawful Basis for Processing

We process personal data based on one or more of the following lawful bases:

- Performance of a contract (e.g., delivering a prosthetic device)
- Compliance with legal obligations (e.g., medical device traceability)
- Legitimate interests (e.g., business operations and analytics)
- Consent (e.g., marketing emails or processing sensitive medical data)

Data Sharing and Transfers

We do not sell personal data to third parties. However, we may share data with:

- Certified medical professionals and clinicians (with consent or where necessary)
- Regulatory authorities and government bodies (when legally required)
- IT and software service providers (under strict data processing agreements)
- Logistics providers (for shipping and delivery)

We ensure appropriate safeguards are in place when transferring data outside the UK, such as Standard Contractual Clauses (SCCs) or adequacy decisions.



Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including:

- Legal and regulatory retention periods (e.g., medical device compliance)
- Contractual obligations
- Customer support or product lifecycle needs
- Data that is no longer needed is securely deleted or anonymized.

Data Security

We take data security seriously and implement appropriate technical and organisational measures, including:

- Encryption of sensitive data
- Secure servers and access controls
- Staff training on data protection
- Regular security audits and monitoring

Your Rights

Under data protection law, individuals have the right to:


- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict or object to processing
- Data portability
- Withdraw consent at any time (if consent was used)


To exercise these rights, please contact us using the details below.

Contact Us

If you have any questions or concerns about how we handle your personal data, or wish to exercise your rights, please contact:

Rebel Bionics Ltd
Unit 5a,
Balm Road Industrial Estate,
Beza Street, Hunslet,
Leeds, LS10 2BG

 info@rebelbionics.com

 +44 (0)113 271 4414

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO): <https://ico.org.uk/>



Ted Varley
CEO
Rebel Bionics Ltd
25/04/2022

Policy effective date: 25/04/2022
Review Date: Annually