



DATA & PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY AND RETAIN A COPY FOR YOUR RECORDS. THIS POLICY FORMS PART OF RETURN2PLAY'S TERMS AND CONDITIONS.

Return2Play Ltd, registered in England and Wales with company number 09616661, (Return2Play, we, us), respects the privacy of every person and is committed to protecting all of your personal data, including sensitive personal health information (Personal Data).

This policy (together with our Terms and Conditions applies to your use of the website at return2play.org.uk (Website).

For the purpose of the Data Protection Act 1998, the data controller is Return2Play Ltd of Bryden Johnson, Lower Coombe St, Croydon CR0 1AA. Return2Play Ltd is registered with the UK's Information Commission as Data Controllers in accordance with the Data Protection Act 1998 with Data Protection Registration Number ZA155207.

The policy will serve as a summary of your privacy rights. The law (currently the Data Protection Act 1998) requires that your Personal Data be kept private unless there is a legal obligation or requirement for disclosure by us to authorised parties, in which case we will make such disclosure(s) as legally obliged. We must give you this notice about our privacy practices and follow the terms of this policy while it is in effect. Your use of the Platform and the Services indicates your acceptance of the terms of this policy.

INTRODUCTION

Return2Play is a platform via which individuals (User, Users, you, your, yourself) to store details of injuries they sustain, document their recovery, and be linked to participating doctors registered with the UK General Medical Council: www.gmc-uk.org, (the GMC) (known as Practitioners). The platform enables users, at their sole discretion, to share injury information with other parties and allow these parties to add information to their online account (Account).

INFORMATION YOU PROVIDE

In order to use the Website or the Services, you may be asked to provide personal details such as your name, address, age, e-mail address and phone number, username, password and other registration information.

The first time you log in to the Platform you will be asked to create an Account. To create an Account, you must provide Personal Data that will be shared members of the Return2Play team (from time to time, as required)



who have been appropriately checked to ensure they meet the requirements to access such information (in accordance with UK law). After you create your Account you can use the same details to log in to the Platform and use the Services.

If you contact us, we may keep a record of that correspondence.

Third Party Information:

We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, analytics providers, search information providers) and may receive information about you from them.

We may associate any category of information with any other category of information and will treat the combined information as Personal Data in accordance with this policy for as long as it is combined.

HOW WE USE YOUR DATA

Return2Play will use the email address you provide when you register to send you an email to validate your Account. Your email address, telephone number and other contact information that you provide via your Account may also be used by Return2Play to enable your use of the Services. Return2Play will use your email address as the primary means to reset your username and password.

We will use your Personal Data:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and Services that you request from us;
- to notify you about changes to the Platform and/or Services;
- to ensure that content from the Platform is presented in the most effective manner for you and your computer or Device;
- to undertake planning, Service evolution, new product development, Service delivery, internal and external performance indicators and a range of other business intelligence functions.
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of the Services;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective buyer or seller.



- If Return2Play or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
 - enforce or apply the Terms and Conditions or to investigate potential breaches; or
 - protect the rights, property or safety of Return2Play, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

SENSITIVE PERSONAL DATA

In order to deliver our Service, Return2Play may hold health information about yourself. This includes health information collected when injuries are recorded, notes and symptom logs that are added to injury records. This is classed as sensitive personal data under the Data Protection Act 1998.

Information that Practitioners on the Platform record in your online notes (your Electronic Medical Records or EMRs) will include relevant and pertinent information that you have discussed with Practitioners on the Platform. Such EMRs may also include Practitioners' comments, diagnoses and commentary as well as factual information, medical advice and the symptoms that you have presented with in a session.

HOW INFORMATION ABOUT YOU MAY BE USED BY RETURN2PLAY

Use and Disclosure of Sensitive Personal Data:

Return2Play may gather sensitive personal data, as described above, to share allow the Service to be delivered. Return2Play may also use aggregated, anonymised data sets of unidentifiable, non-personal information for: (i) statistical analysis, improvement of the Services and customisation of UX-design and content layout or creation; or (ii) sharing with government agencies or regulators that oversee and monitor health care providers in both the public and private sectors.

Further, Return2Play is permitted to use and disclose your sensitive personal data for purposes of: (a) treatment; and (b) to enable medical service provision, as follows:

To Prevent Incidents and Protect You:

Return2Play may use and disclose your Personal Data to the extent required to prevent a serious threat to your health and safety or that of others (including but not limited to instances of child abuse or neglect). In such circumstances Return2Play will only disclose your Personal Data to public bodies or officials who can help prevent the identified or possible threat (as permitted by s.31 Data Protection Act 1998).



To Prevent Public Health Risks:

Return2Play may share your Personal Data for public health activities, as required by departments or parties duly authorised by the UK Government. For example, we may share your Personal Data:

- to report reactions to medicines or problems with products;
- if a Practitioner believes that you may have been exposed to, or may be at risk of spreading, certain specified serious diseases or conditions.

Legal Disputes and Cases:

If you are involved in a legal dispute, Return2Play may share your Personal Data in response to a court order, legal demand or other lawful process.

The Police:

Return2Play may share sensitive personal data if asked to do so by the police in certain limited circumstances, including reporting of certain types of wounds.

National Security:

Return2Play may share, if required, your Personal Data with UK Government officials for national security reasons (as permitted by s.28 Data Protection Act 1998).

COOKIES

A cookie is a small text file that may be placed on your computer or Device when you visit the Platform. When you next visit the Platform the cookie allows us to distinguish you from other users. There are two categories of cookies: (a) 'persistent cookies' that remain on your computer or Device until deleted manually or automatically; and (b) 'session cookies' which remain on your computer or Device until you close your browser, when they are automatically deleted.

The cookies Return2Play uses:

- Essential cookies are required for the operation of the Platform and without them the Platform can't operate properly.
- Performance cookies allow us to see and count the number of visitors to the Platform and what they do during their visit. We use the information from these cookies to improve the Platform's performance. The data from these cookies doesn't allow us to identify you.
- Experience cookies allow the Platform to remember your choices, which means we can personalise your experience of the Platform. Data collection by experience cookies is used by our analytics systems (including third party systems) to monitor and enhance the Platform's user-friendliness.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.



You can REFUSE cookies, by activating settings of your chosen browser(s). If you alter your browser settings to refuse cookies your access to the Platform will be restricted.

SECURITY

The importance of security for all your Personal Data including, but not limited to, sensitive personal data is of great concern to us. At Return2Play, we have gone to great lengths to manage the security and integrity of the Platform and to ensure that we use best-in-class services when providing secure transmission of information from your computer or Device.

Personal Data collected via the Platform is stored in secure environments that are not available or accessible to the public; only those duly authorised people, officers, employees or agents of Return2Play who need access to your information in order to do their jobs are allowed access. Anyone who violates our privacy or security policies is subject to disciplinary action, including possible termination of their contract with Return2Play and civil and/or criminal prosecution.

Return2Play uses the latest technologies to ensure utmost security, including utilising several layers of firewall security and encryption of personal data to ensure the highest level of security.

Return2Play is the sole owner of any data collected via the Platform.

Data Storage:

The data that we collect from you is stored at data centres within the European Economic Area (EEA).

We may collect and store personal data on your Device using application data caches and browser web storage (including HTML 5) and other technology.

Security when using the Platform:

When using the Platform, all your Personal Data are transmitted through the internet using Secure Socket Layers (SSL) technology. SSL technology causes your browser to encrypt your entered information before transmitting it to our secure server. SSL technology, an industry standard, is designed to prevent a third party from capturing and viewing your Personal Data.

No data transmission over the internet can be guaranteed to be 100% secure. While we strive to protect your Personal Data from unauthorised

access, use or disclosure, Return2Play cannot ensure or warrant the security of any information you transmit to us via the Platform. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

OTHER PROVISIONS

**Other Links:**

The Platform may contain links to let you to visit other websites or mobile applications easily. If you click on a link to a third-party site or app, you will leave the Platform and go to the site or app you selected. Because Return2Play cannot control the activities of third parties, we cannot accept responsibility for the content of any such sites or apps or for any use of your Personal Data by such third parties and we cannot guarantee that they will adhere to the same privacy practices as Return2Play. If you visit a third-party website that is linked to our site, you should read that site's privacy policy before providing any personal information.

Notices, Amendments and Updates:

Return2Play may revise this policy to reflect any changes in its privacy practices. We reserve the right to make any revised policy effective for Personal Data we already have about you as well as any information we receive in the future. We will post a copy of the updated policy on our Platform prior to any change becoming effective. The effective date of this policy is displayed directly under the title of the document. If we make any material changes we will notify you by means of a notice on the Platform prior to the change becoming effective.

Accessing Information Held By Us:

If you would like a copy of all of the Personal Data, we hold about you please Contact Us. We do charge for providing information because we have to gather, collate and process this data to make it available to you in its entirety: a fee of £10 must be paid prior to releasing data and details of how this should be paid will be provided in our response to your request. Alternatively, you may write to Return2Play and enclose a cheque payable to Return2Play Ltd in that correspondence. The Data Protection Act allows us up to 40 days (from the date instructions and payment have been received – please note payments must clear first) to retrieve, process and provide the information requested.

Complaints:

If you have any complaints, please contact us at hello@return2play.org.uk

ACCEPTANCE

By using the Platform and/or the Services you acknowledge your acceptance of our privacy policy, as updated from time to time. If you do not agree with this policy you should not use the Platform or the Services. It is recommended that you read this privacy policy each time you consider or choose to use the Platform or the Services to ensure that you have not missed any changes to this Privacy Policy.

Your continued use of the Platform following any changes to the privacy policy (which will be notified to you as described above) signifies your acceptance of those changes.

return **2** *play*

The logo features the text "return 2 play" in a bold, italicized sans-serif font. The number "2" is enclosed in a solid orange circle. A thin orange line starts from the left, passes through the bottom of the "2" circle, and continues to the right. Above the line, it turns upwards and then right, ending in a small orange arrowhead. A small orange pulse symbol is positioned above the line just before the arrowhead.