OBSolve Ltd · OBSolve Inc.

Privacy Policy

Effective Date: October 2026 · Global policy with jurisdiction-specific supplements

Scope and applicability

This Privacy Policy applies to all visitors and users of www.obsolvemedical.com and any related OBSolve websites, regardless of where you are located. OBSolve Ltd is incorporated in England and Wales (Company No. 14858469). OBSolve Inc. is its US subsidiary (Delaware corporation file No. 10621479). Where our obligations differ by jurisdiction, those differences are set out below.

This policy satisfies the requirements of: UK GDPR and the Data Protection Act 2018; the California Consumer Privacy Act (CCPA) as amended by the CPRA; the Virginia Consumer Data Protection Act (VCDPA); the Colorado Privacy Act (CPA); the Connecticut Data Privacy Act (CTDPA); and the Texas Data Privacy and Security Act (TDPSA).

1. Who We Are

UK entity	OBSolve Ltd, Company No. 14858469, England and Wales
US entity	OBSolve Inc., incorporated in the United States (Delaware corporation file No. 10621479). Subsidiary of OBSolve Ltd.
Contact	info@obsolvemedical.com
Website	www.obsolvemedical.com
Role (UK)	Data Controller under UK GDPR
Role (US)	Business under CCPA/CPRA and applicable US state privacy laws

2. Information We Collect

a. Personal data you provide

- Name, job title, and professional credentials
- Email address and telephone number
- Organisation name and role (where relevant to a product or partnership enquiry)
- Any information included in a contact form, demo request, or email to us

b. Technical data we collect automatically

- IP address
- Browser type and version
- Device type and operating system
- Pages visited, time on site, and referring URLs
- General geographic location derived from IP address (country/city level only)

c. Cookies and tracking technologies

We use cookies and similar technologies as described in Section 10. We do not use cookies to build advertising profiles or to track you across third-party websites.

d. Categories of personal information — US residents (CCPA/CPRA)

For California residents and residents of states with equivalent laws, the categories of personal information we collect are:

- Identifiers: name, email address, IP address, organisation name
- Professional or employment-related information: job title, role, institution
- Internet or electronic network activity: pages visited, device and browser data
- Geolocation data: city/country level derived from IP address only

We do not collect sensitive personal information as defined by the CPRA (such as financial account numbers, precise geolocation, health data, racial or ethnic origin, or biometric data).

3. Lawful Bases for Processing (UK and EU Visitors)

Under UK GDPR, we rely on the following lawful bases:

- Consent — where you have given clear permission, for example for marketing emails
- Contract — where processing is necessary to provide a service you have requested
- Legitimate Interests — to operate and improve our website, provided your rights are not overridden
- Legal Obligation — where we must comply with applicable law

4. How We Use Your Data

We use personal data to:

- Respond to enquiries, contact form submissions, and demo requests
- Provide information about OBSolve products, regulatory status, and clinical programmes
- Operate, maintain, and improve our website and user experience
- Send marketing communications where you have consented or we are otherwise permitted
- Analyse website usage patterns using aggregated, anonymised data
- Detect and prevent fraud, security incidents, or misuse of our website
- Comply with legal and regulatory obligations
- Manage our relationships with healthcare professionals, distributors, and partners

> **Note on healthcare professional data**
> OBSolve products are intended for use by qualified healthcare professionals. Where we collect data from clinicians, nurses, or hospital procurement contacts, we treat this as professional contact data and use it solely in connection with our clinical and commercial activities. We are not a covered entity under HIPAA and do not collect protected health information (PHI) through this website.

5. Marketing Communications

We will only send marketing communications where:

- You have opted in expressly, or
- We are permitted to do so under applicable law (including PECR in the UK)

You can opt out at any time by clicking "unsubscribe" in any email or by contacting us at info@obsolvemedical.com. We will act on all opt-out requests promptly and within legally required timeframes.

For US residents: we honour opt-out requests through any channel. We do not send unsolicited commercial email to US recipients without a prior relationship or express consent.

6. Sharing Your Data

We may share your personal data with:

- Service providers — website hosting, analytics, and email service providers who process data on our behalf under appropriate contractual protections
- Professional advisers — legal, accounting, and regulatory consultants bound by professional confidentiality obligations
- Regulatory and governmental authorities — where required by applicable law
- Business partners — in connection with potential or actual commercial relationships, subject to appropriate confidentiality arrangements
- Group companies — OBSolve Inc. (our US subsidiary) may access data in connection with US commercial and regulatory activities

We do not sell your personal data to third parties. We do not share your personal data with third parties for cross-context behavioural advertising purposes.

7. International Transfers

Transfers from the UK to other countries

Where we transfer personal data outside the UK, we ensure appropriate safeguards are in place, including:

- UK adequacy regulations recognising the destination country, or

- International Data Transfer Agreements (IDTAs) or the UK Addendum to EU Standard Contractual Clauses

Transfers from the US to the UK

Where we collect personal data from US residents and it is processed or stored in the UK, we rely on standard data transfer mechanisms and ensure all UK-based processing is governed by the protections in this policy. OBSolve Ltd and OBSolve Inc. operate under a group data sharing agreement governing all intra-group transfers.

8. Data Retention

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

Data type	Retention period
Contact form and enquiry data	Up to 3 years from last contact, unless an ongoing relationship requires longer retention
Demo request and HCP engagement data	Duration of commercial relationship plus up to 5 years
Website analytics data	Aggregated: indefinitely. Individual session data: up to 26 months
Marketing opt-in records	Until opt-out, then 6 years for compliance evidence
Legal and contractual records	As required by applicable law — typically 6 years (UK) or applicable US state law

9. Data Security

We implement appropriate technical and organisational security measures to protect personal data against accidental loss, unauthorised access, disclosure, alteration, or destruction, including:

- Encryption of data in transit using TLS
- Access controls limiting data access to authorised personnel only
- Regular review of our security practices

No website or internet transmission is completely secure. We cannot guarantee absolute security, but will notify affected individuals and relevant authorities following a data breach as required by applicable law.

10. Cookies and Tracking Technologies

We use cookies in line with applicable law (PECR in the UK). Types of cookies we use:

Cookie type	Purpose	Consent required?
Strictly necessary	Essential for website operation and security	No
Analytics	Understanding how visitors use the site (e.g. Google Analytics)	Yes (UK/EU) · Opt-out available (US)
Functional	Remembering your preferences and settings	Yes

You can control cookies through your browser settings. US residents may also opt out of analytics tracking via browser-level Do Not Track signals or by contacting us directly.

11. Your Rights — UK and European Visitors

Under UK GDPR you have the right to:

- Access — request a copy of the personal data we hold about you
- Rectification — request correction of inaccurate or incomplete data
- Erasure — request deletion of your data in certain circumstances
- Restrict processing — request we limit how we use your data
- Object — object to processing based on legitimate interests or for direct marketing
- Data portability — receive your data in a structured, machine-readable format
- Withdraw consent — at any time where processing is based on consent

To exercise any of these rights, contact us at info@obsolvemedical.com. We will respond within one calendar month at no charge.

12. Your Rights — US Residents

Applies to residents of California, Virginia, Colorado, Connecticut, Texas, and other US states with applicable privacy laws
The rights below apply to the extent required by the law of your state of residence.

California residents (CCPA/CPRA)

California residents have the right to:

- Know — the categories and specific pieces of personal information we have collected, the purposes for which we use it, and the categories of third parties with whom we share it
- Delete — request deletion of personal information we have collected, subject to certain exceptions
- Correct — request correction of inaccurate personal information
- Opt out of sale or sharing — we do not sell personal information and do not share it for cross-context behavioural advertising; this right does not apply in practice, but we will honour any such request
- Limit use of sensitive personal information — we do not collect sensitive personal information as defined by CPRA, so this right does not apply in practice
- Non-discrimination — we will not discriminate against you for exercising any privacy right

Virginia, Colorado, Connecticut, Texas, and other US state residents

Residents of these states have substantially similar rights under their respective state laws, including rights to access, correct, delete, and opt out of the sale of personal data. We honour requests under all applicable state laws.

How to submit a US privacy rights request

- Email info@obsolvemedical.com with the subject line "Privacy Rights Request — [Your State]"
- We will verify your identity before processing your request
- We will respond within 45 days (extendable by a further 45 days where required, with notice to you)
- Requests are free of charge unless manifestly unfounded or excessive

Authorised agents

California residents may designate an authorised agent to submit requests on their behalf. We may require proof of authorisation before processing such requests.

13. Do Not Sell or Share My Personal Information

We do not sell personal information. We do not share personal information with third parties for cross-context behavioural advertising. You do not need to take any action to opt out of these activities because we do not engage in them.

If our practices change, we will update this policy and provide a clear opt-out mechanism before doing so.

14. Complaints and Regulatory Oversight

UK residents

If you are unhappy with how we handle your personal data, you may complain to the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk
- Telephone: 0303 123 1113

We would appreciate the opportunity to address your concerns before you contact the ICO.

US residents

If you believe your privacy rights have not been honoured, contact us at info@obsolvemedical.com. You may also have the right to appeal our decisions under applicable state law; we will respond to appeals within the timeframes required by your state.

California residents may also contact the California Privacy Protection Agency (CPPA) at cppa.ca.gov.

15. Third-Party Links

Our website may include links to third-party websites, including regulatory authority websites, clinical resources, and partner organisations. We are not responsible for the privacy practices of those websites and recommend you review their policies independently.

16. Children's Data

Our website is directed at healthcare professionals and industry contacts. It is not intended for anyone under the age of 16 (or 13 under US law). We do not knowingly collect personal data from children. If we become aware we have done so, we will delete it promptly.

17. Regulatory Disclaimer

Important notice regarding OBSolve products

OBSolve devices have not yet received clearance or approval from the U.S. Food and Drug Administration (FDA) or any other regulatory authority. Regulatory submissions are pending. Nothing on this website constitutes a claim of safety or efficacy, or an offer to sell any product. Content on this website is intended for informational purposes directed at qualified healthcare professionals and industry contacts.

18. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or business operations. Updates will be posted on this page with a revised effective date. We will notify you of material changes by email where we hold your contact details, or by a prominent notice on our website before the change takes effect.

Continued use of our website after the effective date constitutes acceptance of the revised policy.

19. Contact Us

For any questions about this Privacy Policy, to exercise your rights, or to raise a concern:

Email	info@obsolvemedical.com
UK website	www.obsolvemedical.com
Subject line (rights requests)	"Privacy Rights Request — [Your State/Country]"
Response time (UK)	Within 1 calendar month
Response time (US)	Within 45 days (extendable where permitted)