

PRIVACY POLICY

OUR PRIVACY OBLIGATIONS

RCR Medical Products LLC (hereinafter “**RCR Medical**”) cares about your privacy and wants you to be familiar with how we collect, use, and disclose information. Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable. RCR Medical's Privacy Policy applies to personal information collected and/or held by rcrmedic.com, x8ttourniquet.com, or rcr-medical-products-llc.myshopify.com.

This Privacy Policy also explains how we process personal data about people in the European Union (EU), as required under the General Data Protection Regulation (GDPR).

By providing personal information to us or by using the Service, you acknowledge that you have read and understand this Privacy Policy.

THE TYPES OF PERSONAL INFORMATION WE COLLECT AND HOLD

We collect personal information about our users in order to provide our products, services, and customer support. Our products, services, and customer support are provided through many platforms including, but not limited to: websites, phone apps, email, and telephone. The specific platform and product, service, or support you interact with may affect the personal data we collect.

Not all information requested, collected, and processed by us is personal information, as it does not identify you as a specific natural person. This will include a majority of user generated content that you provide us with the intention of sharing with other users inside a transaction. Such non-personal information is not covered by this privacy policy. However, as non-personal information may be used in aggregate or be linked with existing personal information, when in this form it will be treated as personal information. As such, this privacy policy will list both types of information for the sake of transparency.

In some situations, users may provide us with personal information without us asking for it, or through means not intended for the collection of particular

types of information. While we may take reasonable steps to protect this data, the user will have bypassed our systems, processes, and control and thus the information provided will not be governed by this privacy policy.

In some situations, users may provide us personal information over platforms that are outside our control; for example, through social media or forums. While any information collected by us is governed by this Privacy Policy, the platform by which it was communicated will be governed by its own Privacy Policy.

HOW WE COLLECT PERSONAL INFORMATION

Information that you specifically give us

While you use our products and services you may be asked to provide certain types of personal information. This might happen through our website, applications, online chat systems, telephone, paper forms, or in-person meetings.

We may request, collect, or process the following information:

- Account Details - password
- Contact Details - email address, phone number
- Location Details - physical address, billing address, time zone
- Identity Details - full name, proof of identity (e.g., drivers license, passport), proof of address (e.g., utility bill)
- Financial Information - credit card details, wire transfer details, payment processor details (e.g., Stripe, Skrill, PayPal), tax numbers
- User Generated Content - transaction descriptions, transaction attachments

Information we collect as you use our website

We maintain records of the interactions we have with our users, including the products, services and customer support we have provided. This includes the interactions our users have with our platform, such as when a user has viewed a page or clicked a button.

When we are contacted, we may collect personal information that is intrinsic to the communication. For example, if we are contacted via email, we will collect the email address used.

We may collect or process the following (mostly non-PII) information:

- Metadata - IP address, computer and connection information, referring web page, standard web log information, language settings, time zone, etc.
- Device Information - device identifier, device type, device plugins, hardware capabilities, etc.
- Actions - pages viewed, buttons clicked, time spent viewing, search keywords, etc.

Links to other sites

On our website, you will encounter links to third party websites. These links may be from us, or they may appear as content generated by other users. These linked sites are not under our control and thus we are not responsible for their actions. Before providing your personal information via any other website, we advise you to examine the terms and conditions of using that website and its privacy policy.

We may share your Personal Data with payment processors and other third-party service providers that assist us in the operation of our services as needed to fulfill your orders, conduct quality assurance testing, facilitate creation of accounts, provide technical support; and/or provide other services to RCR Medical. For example, RCR Medical has implemented Shopify's ecommerce platform within the site. Your use of the site is subject to, and RCR Medical hereby incorporates by reference, Shopify's Terms of Service, located at <https://www.shopify.com/legal/terms>, as such policy may be amended by Shopify from time to time.

HOW WE USE PERSONAL INFORMATION

The information we request, collect, and process is primarily used to provide users with the product or service they have requested. More specifically, we may use your personal information for the following purposes:

- to provide the service or product you have requested;
- to facilitate the creation of RCR Medical Agreements;
- to provide technical or other product support to you;
- to answer inquiries about our services, or to respond to a complaint;
- to promote our other programs, products or services which may be of interest to you (unless you have opted out from such communications);

- to allow for debugging, testing and otherwise operate our platforms;
- to conduct data analysis, research and otherwise build and improve our platforms;
- to comply with legal and regulatory obligations;
- if otherwise permitted or required by law; or
- for other purposes with your consent, unless you withdraw your consent for these purposes.

The lawful processing grounds on which we will use personal information about our users are, but are not limited to:

- when a user has given consent;
- when necessary for the performance of a contract to which the user is party;
- processing is necessary for compliance with our legal obligations;
- processing is necessary to protect the vital interests of our users or of another natural person;
- processing is done in pursuing our legitimate interests, where these interests do not infringe on the rights of our users.

WHEN WE DISCLOSE PERSONAL INFORMATION

To other parties in your transactions

We may disclose your personal information to third parties that participate in a transaction with you, including, but not limited to:

- counterparties,
- distributors; and,
- affiliates involved in origination of the transaction.

Our third-party service providers

The personal information of users may be held or processed on our behalf including in the cloud, by our third-party service providers. Our third-party service providers are bound by contract to only use your personal information on our behalf, under our instructions.

Our third-party service providers include:

- Cloud hosting, storage, networking and related providers
- SMS providers

- Payment and banking providers
- Marketing and analytics providers
- Security providers
- Chat providers
- Email providers

Other disclosures and transfers

We may also disclose your personal information to third parties for the following purposes:

- If necessary to provide the service or product you have requested;
- If we receive court orders, subpoenas or other requests for information by law enforcement;
- If otherwise permitted or required by law; or
- For other purposes with your consent.

As we are a global company, with representatives around the world, your personal information may be processed by staff in any of our offices.

ACCESSING OR CORRECTING YOUR PERSONAL INFORMATION

You have the right to request access to the personal information RCR Medical holds about you. Unless an exception applies, we must allow you to see the personal information we hold about you, within a reasonable time, and without unreasonable expense or for no charge. Most personal information can be accessed by logging into your account.

You also have the right to request the correction of the personal information we hold about you. If you require assistance, please contact our customer support at info@rcrmedic.com.

EXERCISING YOUR OTHER RIGHTS

You have other rights in relation to the personal data RCR Medical holds about you, however, there may be restrictions on how you may exercise the rights. This is largely due to the nature of the products and services we provide. Much of the data we collect is to facilitate contracts between users, facilitate payments, provide protection for the legitimate users, and meet our legal obligations. These data uses are protected against the rights below.

You have the right to:

- opt-out of direct marketing, and profiling for marketing;
- erasure; and
- temporary restriction of processing.

Direct marketing and profiling - users can unsubscribe by following the link included at the bottom of each email.

Erasure - In the case of non-personal data that can be linked with personal data, it will either be erased or otherwise anonymized from the personal data.

Temporary restriction to processing - under certain circumstances you may exercise this right, in particular if you believe the personal data we have is not accurate, or you believe that we do not have legitimate grounds for processing your information. In either case, you may exercise this right by contacting us.

DATA STORAGE CONTROLS

RCR Medical and its third-party cloud storage providers store customer personal information in secure and protected networks. Data is encrypted in storage and in transit to ensure complete protection of data being stored.

YOUR DATA PROTECTION RIGHTS (EUROPEAN ECONOMIC AREA)

If you are located in the EEA, you may have the following additional rights to:

- Request access to and receive information about the personal information we maintain about you, to update and correct inaccuracies in your personal information, restrict or object to the processing of your personal information, have the information anonymized or deleted, as appropriate, or exercise your right to data portability to easily transfer your personal information to another company. In addition, you may also have the right to lodge a complaint with a supervisory authority, including in your country of residence, place of work or where an incident took place. Please click [here](#) for contact information for such authorities.
- Withdraw any consent you previously provided to us regarding the processing of your personal information, at any time and free of charge. We will apply your preferences going forward, and this will not affect the lawfulness of the processing before your consent withdrawal.

Those rights may be limited in some circumstances by local law requirements. You may exercise these rights by contacting us.

TO CONTACT US

If you have an inquiry or a complaint about the way we handle your personal information, or to seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact us as follows:

By Email:

info@rcrmedic.com

By Mail:

RCR Medical
P.O. Box 244
Melissa, TX 75454
United States

While we endeavor to resolve complaints quickly and informally, if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing, by mail or email as above.

We will acknowledge your formal complaint within 10 working days.

UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy at any time. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Service. Your use of the Service following these changes means that you accept the revised Privacy Policy. We recommend that you regularly review the Privacy Policy when you visit our website. This policy was last updated **April 2020**.