JOINT OPERATIONS

Unit 11, Interface Business Park, Bincknoll Lane,
Royal Wootton Bassett, Wiltshire, SN4 8SY, UK

T: +44 (0)1793 575050
E: service@jointoperations.co.uk
W: www.jointoperations.co.uk

PRIVACY NOTICE

Last updated: January 2026

1. INTRODUCTION

Joint Operations respects your privacy and is committed to protecting your personal data. This privacy notice explains how we collect, use, and safeguard your personal information when you:

- Visit our website (https://www.jointoperations.co.uk/);
- Contact us by telephone, email, or letter;
- Instruct us to provide medical device services;
- Subscribe to our newsletter or other communications;
- Purchase products or services from us.

Our website and services are not intended for children under 16, and we do not knowingly collect data relating to children.

Please read this privacy notice carefully. It may be supplemented by additional privacy notices or fair processing information provided on specific occasions when we collect or process your personal data.

2. WHO WE ARE

Joint Operations Ltd is the data controller responsible for your personal data (referred to as "Joint Operations", "we", "us", or "our" in this privacy notice).

Our contact details:

- Legal entity: Joint Operations Ltd
- Data Privacy Manager: Simon Hinks
- Email: simon@p-m-a.co.uk
- Address: Unit 11, Interface Business Park, Bincknoll Lane, Royal Wootton Bassett, Wiltshire SN4 8SY, UK
- Telephone: +44 (0) 1793 575 050
- Website: https://www.jointoperations.co.uk/

If you have any questions about this privacy notice or wish to exercise your data protection rights, please contact our Data Privacy Manager using the details above.

Joint Operations Limited. Registered in England and Wales: 11817255
Registered Office: Unit 11, Interface Business Park, Bincknoll Lane, Royal Wootton Bassett, Wiltshire, SN4 8SY, UK
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2.1 Your Right to Complain

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters. You can contact the ICO at www.ico.org.uk or by telephone on 0303 123 1113. However, we would appreciate the opportunity to address your concerns before you approach the ICO, so please contact us first.

2.2 Changes to This Privacy Notice

We may update this privacy notice from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. The current version was last updated in January 2026.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.3 Third-Party Websites

Our website may contain links to third-party websites, plug-ins, and applications. We do not control these third-party websites and are not responsible for their privacy practices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

3. PERSONAL DATA WE COLLECT

Personal data means any information about an individual from which that person can be identified. We may collect, use, store, and transfer the following categories of personal data about you:

Identity Data: first name, last name, title, date of birth, gender, and username or similar identifier.

Contact Data: postal address, email address, and telephone numbers.

Financial Data: bank account and payment card details.

Transaction Data: details about payments to and from you and information about products and services you have purchased.

Technical Data: internet protocol (IP) address, login data, browser type and version, time zone setting, location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.

Profile Data: username and password, purchases or orders, your interests, preferences, and feedback and survey responses.

Usage Data: information about how you use our website, products, and services.

Marketing and Communications Data: your preferences in receiving marketing from us and your communication preferences.

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Health Data: medical information necessary for manufacturing patient-specific orthopaedic implants, including diagnostic images, measurements, and clinical assessments (this is special category data subject to enhanced protections).

We also collect, use, and share aggregated or anonymised data for statistical or demographic purposes. Such data does not directly or indirectly reveal your identity and is not considered personal data under UK data protection law. However, if we combine aggregated data with your personal data so that it can identify you, we treat the combined data as personal data.

4. HOW WE COLLECT YOUR PERSONAL DATA

We collect personal data through the following methods:

4.1 Direct Interactions

You may provide us with your Identity, Contact, Financial, and Health Data by:

- Applying for our products or services;
- Creating an account on our website;
- Subscribing to our services, publications, or newsletter;
- Requesting marketing materials;
- Entering a competition, promotion, or survey;
- Providing feedback or contacting us;
- Corresponding with us by post, telephone, email, or otherwise.

4.2 Automated Technologies

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns using cookies, server logs, and similar technologies. We may also receive Technical Data if you visit other websites that employ our cookies. For more information about cookies, see Section 9 below.

4.3 Third Parties and Public Sources

We may receive personal data about you from:

- Healthcare providers, hospitals, and clinicians within the United Kingdom who refer patients or provide medical information for manufacturing purposes;
- Analytics providers (such as Google);
- Providers of technical, payment, and delivery services;
- Advertising networks and search information providers;
- Publicly available sources such as Companies House and the Electoral Register.

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5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data where UK data protection law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of contract:** where we need to perform a contract we are about to enter into or have entered into with you;
- **Legitimate interests:** where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- **Legal obligation:** where we need to comply with a legal or regulatory obligation;
- **Consent:** where you have given us specific consent to use your personal data for a particular purpose (primarily for processing health data and sending marketing communications).

You have the right to withdraw consent at any time by contacting us. This will not affect the lawfulness of any processing carried out before you withdraw consent.

5.1 Purposes for Processing Your Personal Data

The table below describes the main purposes for which we use your personal data and the legal bases we rely on. We may process your personal data for more than one lawful basis depending on the specific purpose.

To register you as a customer

Data used: Identity, Contact

Legal basis: Performance of contract

To process and deliver your orders

Data used: Identity, Contact, Financial, Transaction, Marketing and Communications

Legal basis: Performance of contract; Legitimate interests (to recover debts due to us)

To manufacture patient-specific implants

Data used: Identity, Health Data

Legal basis: Explicit consent (Article 9(2)(a) UK GDPR); Performance of contract; Article 9(2)(h) UK GDPR (healthcare and medical device manufacturing)

To manage our relationship with you

Data used: Identity, Contact, Profile, Marketing and Communications

Legal basis: Performance of contract; Legal obligation; Legitimate interests (to keep records updated and study how customers use our products/services)

To administer and protect our business and website

Data used: Identity, Contact, Technical

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Legal basis: Legitimate interests (for running our business, IT services, network security, fraud prevention); Legal obligation

To deliver relevant content and measure advertising effectiveness

Data used: Identity, Contact, Profile, Usage, Marketing and Communications, Technical

Legal basis: Legitimate interests (to study customer behaviour, develop products, grow our business, inform marketing strategy)

To make recommendations about goods or services

Data used: Identity, Contact, Technical, Usage, Profile

Legal basis: Legitimate interests (to develop products/services and grow our business)

6. MARKETING COMMUNICATIONS

6.1 Our Marketing

We may use your Identity, Contact, Technical, Usage, and Profile Data to understand what you may be interested in. This helps us decide which products, services, and offers may be relevant for you.

You will receive marketing communications from us if you have: (a) requested information or purchased goods/services from us, or (b) provided your details when entering a competition or promotion, and in each case, you have consented to receive marketing or have not opted out.

6.2 Third-Party Marketing

We will only share your personal data with companies outside Joint Operations for marketing purposes where you have given us express consent to do so.

6.3 Opting Out

You can ask us to stop sending marketing messages at any time by logging into our website and adjusting your preferences, following the opt-out links in any marketing message, or contacting us directly. Note that opting out of marketing will not apply to personal data provided as a result of a product/service purchase or other transactions.

7. DISCLOSURE OF YOUR PERSONAL DATA

We may share your personal data with the following categories of recipients:

- **Internal third parties:** Other companies within our group who provide IT, system administration, and leadership reporting services;
- **External third parties:** Service providers who perform functions on our behalf, including IT service providers, payment processors, delivery companies, medical device manufacturers and suppliers;

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- **Professional advisers:** Lawyers, bankers, auditors, insurers, and other professional consultants;
- **Regulators and authorities:** HM Revenue & Customs, the ICO, and other regulatory bodies who require reporting of processing activities;
- **Business transfers:** Third parties to whom we may sell, transfer, or merge parts of our business or assets.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third-party service providers to use your personal data for their own purposes and only permit them to process it for specified purposes and in accordance with our instructions.

8. INTERNATIONAL TRANSFERS

We may share your personal data with medical device manufacturers and suppliers located outside the United Kingdom. This may involve transferring your data to countries that do not provide the same level of data protection as the UK.

Whenever we transfer your personal data outside the UK, we ensure appropriate safeguards are in place to protect it. We use one or more of the following mechanisms:

- **UK International Data Transfer Agreement (IDTA):** Standard contractual clauses approved by the UK government that provide the same protection to personal data as it has in the UK;
- **UK Addendum to EU Standard Contractual Clauses:** Where we use EU Standard Contractual Clauses with the UK Addendum;
- **Adequacy decisions:** Transfers to countries that have been deemed by the UK government to provide adequate protection for personal data;
- **Other appropriate safeguards:** Such as binding corporate rules or codes of conduct approved by the ICO.

Please contact us if you would like further information about the specific mechanism we use when transferring your personal data outside the UK.

9. COOKIES AND TRACKING TECHNOLOGIES

Our website uses cookies and similar tracking technologies to distinguish you from other users and enhance your browsing experience. Cookies are small text files placed on your device that help us:

- Remember your preferences and settings;
- Understand how you use our website;
- Improve website performance and functionality;
- Deliver relevant advertising.

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You can set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. However, if you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

For detailed information about the cookies we use and how to manage your cookie preferences, please see our Cookie Policy available on our website. Non-essential cookies are only used where you have provided consent in accordance with the Privacy and Electronic Communications Regulations (PECR).

10. DATA SECURITY

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised manner, altered, or disclosed. These measures include:

- Technical safeguards such as encryption, firewalls, and secure servers;
- Organisational measures including access controls and staff training;
- Regular security assessments and updates to our systems.

We limit access to your personal data to employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

We have established procedures to deal with any suspected personal data breach and will notify you and the ICO of a breach where we are legally required to do so.

11. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and applicable legal requirements.

Standard retention periods:

- Customer records (Identity, Contact, Financial, Transaction Data): 6 years after the end of the customer relationship for tax and accounting purposes;
- Health data and manufacturing records: 11 years from the date of manufacture (to comply with Medical Device Regulations);
- Marketing data: Until you unsubscribe or ask us to delete it;
- Website usage data: Typically 26 months.

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In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we may use this information indefinitely without further notice to you.

12. YOUR LEGAL RIGHTS

Under UK data protection law, you have the following rights in relation to your personal data:

Right of access: You can request a copy of the personal data we hold about you (commonly known as a "data subject access request").

Right to rectification: You can ask us to correct any incomplete or inaccurate personal data we hold about you.

Right to erasure: You can ask us to delete or remove your personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object (see below), where we may have processed your information unlawfully, or where we are required to erase your data to comply with local law. Note that we may not always be able to comply with your request for specific legal reasons, which we will notify you of at the time.

Right to object: You can object to the processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation that makes you want to object. You also have the right to object where we are processing your personal data for direct marketing purposes.

Right to restriction: You can ask us to suspend the processing of your personal data in certain scenarios, for example if you want us to establish the data's accuracy or the reason for processing it.

Right to data portability: You can request the transfer of your personal data to you or to a third party in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent: Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw consent.

Rights related to automated decision-making: You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. We do not currently make automated decisions of this nature.

To exercise any of these rights, please contact our Data Privacy Manager using the contact details in Section 2. You will not normally have to pay a fee to exercise your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive.

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12.1 Response Times

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer if your request is particularly complex or you have made multiple requests. In this case, we will notify you and keep you updated.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to anyone who has no right to receive it.

13. ADDITIONAL INFORMATION

13.1 Research and Statistics

We may process personal data for research purposes (including scientific and historical research) or for statistical purposes in accordance with the Data (Use and Access) Act 2025. Where we do so, we implement appropriate safeguards for your rights and freedoms, particularly when processing special category data such as health information.

13.2 If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

13.3 Changes of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If you wish to understand how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

14. GLOSSARY

14.1 Legal Bases for Processing

Legitimate interests: Processing is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not overridden by your interests or fundamental rights and freedoms. Our legitimate interests include conducting and managing our business to enable us to give you the best service and experience, and the most secure experience.

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Performance of contract: Processing is necessary for the performance of a contract with you or to take steps at your request before entering into a contract.

Legal obligation: Processing is necessary for compliance with a legal or regulatory obligation that we are subject to.

Consent: You have given clear consent for us to process your personal data for a specific purpose.

14.2 Categories of Third Parties

Internal third parties: Other companies within our group acting as joint controllers or processors, based in the United Kingdom, who provide IT and system administration services and undertake leadership reporting.

External third parties: Service providers acting as processors who provide IT and system administration services, payment processing, delivery services, and professional advisory services. These may be based in the United Kingdom or outside the UK. Also includes medical device manufacturers and suppliers, sales agents, lawyers, bankers, auditors, insurers, and other consultants.

15. QUESTIONS AND FEEDBACK

If you have any questions about this privacy notice or our privacy practices, please contact our Data Privacy Manager:

Simon Hinks

Email: dpo@jointoperations.co.uk

Telephone: +44 (0) 1793 575 050

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* * *

This privacy notice complies with the UK General Data Protection Regulation

and the Data (Use and Access) Act 2025

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