

## **Privacy Notice: V.1 August 2024**

The Reconstruction Unlimited Group is committed to safeguarding the privacy of information entrusted to us, including when you visit any of our online services, such as our Website located at [www.reconstructionunlimited.com](http://www.reconstructionunlimited.com) ("Website") or receive any of our services ("Services"). This Privacy Policy is designed to help you understand how we may collect, use, process, and disclose your personal information when you visit our Website, receive any of our Services, or interact with us in our business-to-business relationships.

### **WHAT PERSONAL DATA DO WE PROCESS, WHY AND FOR WHAT PURPOSES**

The categories of personal information we collect depend on how you interact with us and the requirements of applicable law. We collect personal information when you provide it to us directly, automatically, when you visit the Website, and from other sources, including business partners such as medical institutions and other health care providers, as described below.

<b>Personal data we process</b>	<b>Why do we process it?</b>	<b>What's our lawful basis?</b>
<b>Website Visitors</b>		
<small>UNEPB</small> Personal data that you provide to us when you contact us, for example your name, contact details (home address, email address and telephone number), employer, details of your query and any extra information that you choose to tell or provide to us (" <b>Communication Data</b> ")		<small>UNEPB</small> As necessary for our legitimate interests in running and administering our business, providing you with information you have requested or responding to queries from you
<small>UNEPB</small> Health data that you provide to us when you contact us, for example your individual health conditions, diseases or diagnosis; social psychological, behavioral and medical interventions; health-related surgeries or procedures; use or purchase of prescribed medication; gender-affirming care information; reproductive or sexual health information; and data that identifies an individual seeking health care services (" <b>Health Data</b> ")	<small>UNEPB</small> To provide you with the information and services you request from us, this may include information about any events we host or attend	<small>UNEPB</small> As necessary to take steps to enter into a contract to provide you with our services  <small>UNEPB</small> With respect to any special category data, the processing is carried out where we have your explicit consent to do so unless the processing is necessary to protect your vital interests.

# RECONSTRUCTION UNLTD.

Personal data we process	Why do we process it?	What's our lawful basis?
<p><small>GDPR</small> Your name and email address</p>	<p><small>GDPR</small> To send you marketing communications in line with your specified preferences. You can unsubscribe at any time by clicking on the "unsubscribe" link at the bottom of any newsletter that you receive or by contacting us in accordance with the "Contact Us" section below</p>	<p><small>GDPR</small> Where you have provided us with your consent to do so</p> <p><small>GDPR</small> Under our legitimate interests to promote our business to other businesses and professionals</p>
<p><small>GDPR</small> Online identifiers (including IP address), device information and information about your visit to our Website (including the full Uniform Resource Locators (URL)), clickstream to, through and from our Website (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page) ("<b>Device and Web Data</b>")</p>	<p><small>GDPR</small> To provide you with a customised experience to meet your reasonable expectations of how our Website operates and to ensure content is presented in the most effective manner for you or your device</p>	<p><small>GDPR</small> As necessary for our legitimate interests in providing, running and administering our Website</p>
<p><small>GDPR</small> Device and Web Data</p>	<p><small>GDPR</small> For internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes</p>	<p><small>GDPR</small> As necessary for our legitimate interests in evaluating, developing and improving our services</p>
<p><small>GDPR</small> Device and Web Data</p>	<p><small>GDPR</small> To keep the Website safe and secure</p>	<p><small>GDPR</small> As necessary for our legitimate interests in maintaining the security of the Website</p>
<p><small>GDPR</small> Details that you provide to us about your interests and your preferences as well as inferences drawn from those details that reflects your preferences, characteristics, behaviour and attitude ("<b>Inferences and Preferences</b>")</p>	<p><small>GDPR</small> To analyse preferences, trends or statistics</p>	<p><small>GDPR</small> As necessary for our legitimate interests in providing you with information relevant to you and your requirements</p>

**Clients (Consumers)**

# RECONSTRUCTION UNLTD.

Personal data we process	Why do we process it?	What's our lawful basis?
<p>☐ Communication Data;</p> <p>☐ Information provided during our sessions ("<b>Session Data</b>");</p> <p>☐ Health Data; and</p> <p>☐ Additional personal data you provide to us as part of your introductory paperwork, including your culture or ethnic background, relationship status, family members, current concerns, mental health history, family history (including medical), trauma and life events, details of your support systems and conflicts, information relating to self-care steps you take and any additional information you provide to us ("<b>Introductory Paperwork Data</b>")</p>	<p>☐ To provide our services to you</p>	<p>☐ As necessary to fulfil our contractual obligations to you</p> <p>☐ With respect to any special category data, the processing is carried out where we have your explicit consent to do so unless the processing is necessary to protect your vital interests</p>
Job Applicants		
<p>☐ Communication Data; and</p> <p>☐ Your CV, education and qualifications, employment history and references ("<b>Application Data</b>")</p>	<p>☐ To carry out recruitment activities (including to assess your skills, qualifications and suitability for the role and to communicate with you about the recruitment process</p>	<p>☐ We do this as is necessary for our legitimate interest to assess your suitability for the role and to manage and administer the recruitment process effectively</p> <p>☐ Where necessary to take steps to enter into a contract with you</p>
<p>☐ Candidate Data</p>	<p>☐ To carry out any vetting checks, including right to work checks</p>	<p>☐ Where necessary to take steps to enter into a contract with you</p> <p>☐ To comply with our legal obligations</p>
<p>☐ Where required or permitted by applicable law, criminal record checks</p>	<p>☐ To carry out criminal record checks where permitted by applicable law</p>	<p>☐ To comply with our legal obligations</p>

Personal data we process	Why do we process it?	What's our lawful basis?
law, criminal record check results (" <b>Criminal Record Data</b> ")	applicable law	<small>GDPR:</small> With respect to any criminal offence data, the processing is necessary for the purposes of carrying out our obligations in connection with employment
<small>GDPR:</small> Information relating to disabilities and any required reasonable adjustments (" <b>Disability Data</b> ")	<small>GDPR:</small> To make reasonable adjustments to the interview process for you	<small>GDPR:</small> To comply with our legal obligations <small>GDPR:</small> With respect to any special category personal data the processing is necessary for the purposes of carrying out our obligations and the safeguarding of your fundamental rights in connection with your employment
<small>GDPR:</small> Equal opportunities monitoring information, including information relating to your race, ethnicity, sexual orientation and religious beliefs (" <b>Equality and Diversity Data</b> ")	<small>GDPR:</small> For equal opportunity monitoring purposes	<small>GDPR:</small> We do this as is necessary for our legitimate interest to manage and monitor diversity, equality and inclusion efforts <small>GDPR:</small> As necessary for the substantial public interest of ensuring equality of opportunity or treatment

## AUTOMATED DECISION MAKING

We will not undertake any automated decision making in relation to the personal data we process about you.

## SHARING PERSONAL DATA

What personal data?	Who do we share it with?	Why do we share it?	What's our lawful basis for sharing?
<b>Website Visitors</b>			
	<small>GDPR:</small> Reconstruction Unlimited Affiliates	<small>GDPR:</small> To ensure your request is processed by the appropriate party in accordance with your reasonable expectations	<small>GDPR:</small> As necessary for our legitimate interests in processing your request and ensuring the appropriate party responds appropriately to you

# RECONSTRUCTION UNLTD.

<small>ORFPO</small> Communication Data; and <small>ORFPO</small> Health Data	<small>ORFPO</small> Third party service providers	<small>ORFPO</small> To ensure your request is processed by the appropriate party in accordance with your reasonable expectations	<small>ORFPO</small> As necessary for our legitimate interests in processing your request and ensuring the appropriate party responds appropriately to you
	<small>ORFPO</small> Regulators or other authorities	<small>ORFPO</small> Where we are required to do so to comply with our legal obligations	<small>ORFPO</small> Where we share personal data in order to comply with our legal obligations or to defend legal claims made against us
<small>ORFPO</small> Device and Web Data; and <small>ORFPO</small> Inferences and Preferences	<small>ORFPO</small> Reconstruction Unlimited Affiliates	<small>ORFPO</small> To administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes	<small>ORFPO</small> As necessary for our legitimate interests in: <ul style="list-style-type: none"> <li>• providing, running and administering our Website;</li> <li>• providing you with content relevant to you in the most optimum format;</li> <li>• evaluating, developing and improving our services; and</li> <li>• maintaining the security of our Website</li> </ul>
	<small>ORFPO</small> Third party service providers		
	<small>ORFPO</small> Regulators or other authorities	<small>ORFPO</small> Where we are required to do so to comply with our legal obligations	<small>ORFPO</small> Where we share personal data in order to comply with our legal obligations or to defend legal claims made against us
<b>Clients (Consumers)</b>			
	<small>ORFPO</small> Reconstruction Unlimited Affiliates	<small>ORFPO</small> To provide joint services	<small>ORFPO</small> As necessary for our legitimate interests in providing our services to you
		<small>ORFPO</small> To improve our services	<small>ORFPO</small> As necessary for our legitimate interests in providing our services to you
		<small>ORFPO</small> To send you marketing communications	<small>ORFPO</small> Where you have provided us with your consent to do so

# RECONSTRUCTION UNLTD.

<small>REGP</small> Communication Data; <small>REGP</small> Health Data; <small>REGP</small> Session Data; and <small>REGP</small> Introductory Paperwork Data		<small>REGP</small> ns in line with your specified preferences	<small>REGP</small> As necessary for our legitimate interests in providing our services to you (where you are a business client)
	<small>REGP</small> Third party healthcare providers	<small>REGP</small> To provide our services	<small>REGP</small> As necessary to fulfil out contractual obligations to you and provide our services
			<small>REGP</small> With respect to any special category data, the processing is carried out where we have your explicit consent to do so unless the processing is necessary to protect your vital interests
	<small>REGP</small> Professional advisors, such as accountants, lawyers or auditors	<small>REGP</small> Where we are required to do so to comply with our legal obligations or to defend or protect our rights	<small>REGP</small> Where we are required to do so to comply with our legal obligations or to defend or protect our rights
			<small>REGP</small> With respect to any special category data, the processing is carried out where we have your explicit consent to do so unless the processing is necessary to protect your vital interests
	<small>REGP</small> Regulators or other authorities	<small>REGP</small> Where we are required to do so to comply with our legal obligations or to defend or protect our rights	<small>REGP</small> Where we share personal data in order to comply with our legal obligations or to defend legal claims made against us
<small>REGP</small> Third parties as part of a corporate transaction	<small>REGP</small> As part of a corporate transaction, for example if it is proposed that we are to merge with or be acquired by another business in the future	<small>REGP</small> As necessary for our legitimate interests in the context of a corporate transaction	

## Job Applicants

# RECONSTRUCTION UNLTD.

<small>REGP</small> Application Data; <small>REGP</small> Criminal Record Data; <small>REGP</small> Disability Data; and <small>REGP</small> Equality and Diversity Data	<small>REGP</small> Reconstruction Unlimited Affiliates	<small>REGP</small> To carry out recruitment activities (including to assess your skills, qualifications and suitability for the role and to communicate with you about the recruitment process)	<small>REGP</small> We do this as is necessary for our legitimate interest to assess your suitability for the role and to manage and administer the recruitment process effectively
	<small>REGP</small> Professional advisors, such as accountants, lawyers or auditors <small>REGP</small> Professional advisors, such as accountants, lawyers or auditors	<small>REGP</small> Where we are required to do so to comply with our legal obligations or to defend or protect our rights	<small>REGP</small> Where we are required to do so to comply with our legal obligations or to defend or protect our rights
	<small>REGP</small> Regulators or other authorities	<small>REGP</small> Where we are required to do so to comply with our legal obligations or to defend or protect our rights	<small>REGP</small> Where we are required to do so to comply with our legal obligations or to defend or protect our rights

## WHERE DO WE STORE YOUR PERSONAL DATA

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We may transfer your personal data to a recipient based in a country outside of the UK and/or European Economic Area. Where we do so, we will ensure that such transfer is in accordance with our obligations under Data Protection Legislation. For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

## HOW LONG WE KEEP YOUR INFORMATION

We will retain your personal information for as long as reasonably necessary to fulfil the purpose(s) for which it was collected, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws or regulations.

## YOUR RIGHTS IN RELATION YO YOUR PERSONAL DATA

Under applicable data protection legislation, you have a number of rights available, namely the right to:

- ☒ **access** your personal data. This will include access to your personal health information, where you can request us to (i) confirm whether we are processing your personal health information; (ii) confirm whether we sell or share your personal health information; or (iii) provide a list of third parties and affiliates with whom we have sold or shared your personal health information and an active email address or online mechanism to contact these third parties;
- ☒ **correct** incomplete/ inaccurate data;
- ☒ **erase** the personal data we hold about you;
- ☒ **restrict** how we handle your personal data;
- ☒ ask us to **transfer your personal data** to a third party;
- ☒ **object** to how we process your personal data; and
- ☒ **withdraw your consent** at any time (including to receive email communications, phones calls and text messages).

To exercise one of these rights, please contact us below. If contacting us by email, please write "**Exercising My Privacy Rights**" in the subject line. In the body of the email, please describe which right(s) you would like to exercise.

However, please note that some of these rights may not always apply, as there are certain requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when the rights may not apply at all.

You also have the right to complain to the regulator about Reconstruction Unlimited's information rights procedures. Where you are in the EU, you may contact your local Supervisory Authority - a full list of Supervisory Authorities in the EU can be found [here](#). In the UK, the relevant regulator is the ICO and you can make your complaint via the ICO's website [here](#). In Switzerland, the relevant regulator is the FDPIC and you can make your complaint via the FDPIC's website [here](#).

## CONTACT US

If you have any questions about our privacy practices, please contact us at [contact@reconstructionunlimited.com](mailto:contact@reconstructionunlimited.com) or by phone (+1 888-303-6808).