

Netmind Life Privacy Policy

Last updated: June 19, 2024 (v1.2)

- Added data policy in related to the use of Google APIs in Section 5

This Privacy Policy applies to our Services and should be read together with our Terms and Conditions available at [netmindai.blob.core.windows.net].

1. Who we are

We are Netmind.AI Limited ('Netmind Life') of Et2.02 Cargo Works, 1-2 Hatfields, London SE1 9PG. We provide wellness, bridging the gap between intricate health insights and accessible, actionable strategies for all.

You can contact us at *clientsupport@netmind.life*

2. How we collect your personal data

We typically collect your personal data from you directly, for example through our website.

With your consent, we may collect your personal data from a third party. For example, with your consent, blood test clinics and at-home testing companies may share the results and analysis of your tests in connection with the Services we provide to you.

3. Why we use your personal data

We will only use your personal data where we have a lawful basis to do so. Our lawful basis is:

- **Providing our Services:** where necessary for the performance of the contract between us or to take steps at your request prior to entering into the contract.
- **Improving and developing our Services:** where necessary for the purposes of our legitimate interests in improving and developing our Services.
- **Marketing our Services and similar goods or services to you:** where necessary for the purposes of our legitimate interests in promoting our goods and services.

We will only use special categories of personal data (e.g. health and genetic data) with your consent. Due to the nature of some of our Services, it is necessary for us to process your health and/or genetic data. It is up to you whether to provide your consent, and you may withdraw your consent at any time, but we will be unable to provide our full range of Services without your consent.

We may send you marketing to offer similar goods or services to those you are already receiving from us. You may opt out from receiving marketing from us at any time. Otherwise, we will only send you marketing at your request or with your consent.

We may install cookies on your device where necessary to receive our Services, for example to remember the subscriptions added to your online basket, proceed to checkout, and ensure your connection to our website is secure. We will only install non-essential cookies on your device (or use similar tracking technologies) with your consent.

We are proud of using innovative automated technology, including artificial intelligence (AI), to provide the best possible Services. This includes automated evaluation of your health and genetic data to make tailored recommendations to you. Our Services do not typically involve making solely automated decisions about you that have a legal or similarly significant effect. However, should we offer such a Service, we will explain this to you when offering the Service and only provide the Service with your consent.

4. What personal data do we collect and use

We typically collect and use the following categories of personal data for the purposes set out above:

- Name, date of birth, and address/contact details
- Account information, including registration details
- Marketing preferences
- Purchase, viewing and account history and payment details (including card or bank information for transfers and direct debits)
- Website user data (including IP addresses, user journeys and cookie tracking)
- Records of consent, where appropriate
- Health data
- Genetic data

5. Who we share your personal data with

We will not share your personal data with anyone else without your consent, subject to the limited exceptions set out below.

We may use data processors to provide our Services. Our data processors act on our behalf and in accordance with our instructions. Our data processors are not permitted to use your personal data for any other purpose. We vet our data processors and enter into a contract with them to ensure that they have appropriate measures in place to keep your personal data secure.

Specifically, NetMind Life use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

We may share personal data with our lawyers, accountants and auditors in the normal course of our business or in the event of a legal dispute. We may share personal data with regulatory or tax authorities, where necessary for regulatory or tax purposes. We may share personal data in connection with a corporate transaction concerning Netmind.AI Limited, such as restructure, takeover, merger or acquisition. We may share personal data where we are legally required to do so, for example in accordance with a court order. In all cases we will only share such personal data as is necessary for such purposes.

6. How we store your personal data

Your personal data is kept securely within the UK. Neither we, nor our data processors, transfer your personal data outside of the UK.

We will keep your personal data for so long as is necessary for the purposes set out in this Privacy Policy. Where you stop receiving our Services, we will typically keep some of your personal data for a period of 6 years, where necessary for legal, regulatory or tax purposes. This is subject to your rights to request erasure of your personal data (see below).

7. Your data protection rights

Under data protection law, you have rights including:

- **Access:** you have the right to ask us for copies of your personal data.
- **Rectification:** you have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Erasure:** you have the right to ask us to erase your personal data in certain circumstances.
- **Restriction of processing:** you have the right to ask us to restrict the processing of your personal data in certain circumstances.

- **Object:** you have the right to object to the processing of your personal data in certain circumstances.
- **Data portability:** you have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- **Withdraw consent:** when we use consent as our lawful basis you have the right to withdraw your consent.

Usually, you do not need to pay a fee to exercise your rights and we have one calendar month to respond to you. Please note that the law allows us to charge a fee, refuse your request or take more time to respond in specified circumstances.

To make a data protection rights request, please contact us using the contact details at the top of this Privacy Policy.

8. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we have used your data after raising a complaint with us, you can also complain to the Information Commissioner's Office (ICO).

The ICO's address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>