

Hello, welcome to Adia's Privacy Policy, Adia is a business focused on matters about which people are understandably incredibly sensitive. We therefore take data privacy and ethics seriously.

In this policy we tell you how we process and protect your data and how we respect your privacy. This policy applies to anyone who is an Adia customer, or just visiting our Website. So please do read this Privacy Policy carefully.

By using our Website and Services you agree to be bound by these terms and conditions of use. If you do not agree with the terms of this Privacy Policy you should leave the Website or stop using the Services immediately.

If you have any questions or concerns please do email us at [hello@adiahealth.com](mailto:hello@adiahealth.com).

We may revise our Privacy Policy from time to time. Any changes will be posted on this page, and if appropriate, we will email you to notify you.

Contents of this policy:

<b>1. About Adia</b>	<b>1</b>
<b>2. How we collect and store personal information</b>	<b>2</b>
<b>6. Your choices and rights</b>	<b>5</b>
<b>7. Making a complaint</b>	<b>6</b>
<b>8. Security</b>	<b>6</b>

## **1. About Adia**

We are registered as a limited company in the UK as Adia Health Limited. Our registration number is 11368931 and our registered offices is Camden Town Hall, Judd Street, Kings Cross, London W1C 9JE. We are registered with the UK Information Commissioner's Office (ZA465942).

Our contact for data protection is Rose Acton. If you have any questions about this policy, or would like to find out more about how we handle data, please email Rose at [hello@adiahealth.com](mailto:hello@adiahealth.com) Or you can also reach her by post at 4-5 Bonhill Street, London, EC2A 4BX.

## 2. How we collect and store personal information

The term 'personal information' describes information which we collect and which can be used to personally identify someone. For example, a name, a personal address or an IP address.

Here we list all the personal information we hold about you, both that you provide and that we collect.

- Identity Data - first name, last name, username or similar identifier, date of birth and gender.
- Contact Data - billing address, delivery address and email address.
- Financial Data - bank account and payment card details.
- Transaction Data - details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data - your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses and messages.
- Usage Data - information about how you use our website, products and services.
- Marketing and Communications Data - your preferences in receiving marketing from us and our third parties and your communication preferences.
- We also collect personal information about you from our business partners, suppliers and subcontractors (for example, doctors, laboratories and nutritionists)

As a result the types of personal information that we receive as a result of our services include the following special categories of personal data:

- Data concerning health;
- Biometric data, relating to your physical or physiological characteristics

Please remember that if you choose to withdraw your consent to our processing of these categories of information, it's likely we will be unable to provide our services to you, and the contract will be terminated.

To help us make sure we're delivering the best service possible, we also collect information on your

visit to our Website. This includes how you got to our Website, the date and time you visited our Website, length of visits to certain pages, page interaction information (such as scrolling and clicks) and methods used to browse away from the page. We also collect technical information such as your IP addresses, domain names, your browser type and version, the country you're visiting from. We keep this information anonymous as much as possible to protect your privacy. We do work with advertising networks and information providers and analytics providers and sometimes we receive information about you from them.

We store personal information for as long as you use the services we provide. We will hold your personal information for 6 years after the contract comes to an end, this is to satisfy our obligations in relation to tax records and insurance.

### **3. How do we use your personal data?**

We only ever use your information in line with data protection laws - in particular, the EU General Data Protection Regulation, otherwise known as GDPR, and The Data Protection Act 2018. This means we only use it where we have a legal basis to do so.

These are the general legal basis for which we use your information:

- Consent - you have given clear consent to us to process your personal information for a specific purpose.
- Our contract - the main ground on which we process your personal information and special category data is to provide our services to you - this means that processing your personal information is necessary for the contract you have with us, or because we have asked you to take specific steps before entering into that contract.
- Legitimate interests - processing your personal information is necessary for our legitimate interests or those of a third party, provided those interests are not outweighed by your rights and interests. This includes marketing purposes, corporate due diligence and financial modelling, service development and innovation. This will benefit you by allowing us to monitor, develop and improve our services.

Here are the specific reasons we process your personal information:

- to allow you to access and use our Website and to register for an account;
- to provide you with the information, products and services that you request from us, including to deliver the "blood test" and "test report" services;
- for marketing, advertising and promotional purposes;
- for improving and maintaining our Website or Services;
- to notify you about changes to our Services; and
- with your consent only, to contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you.

We do carry out automated data processing, this is defined as decisions which are made without any human involvement. We only carry out automated data processing where it is necessary for entry into, or performance of, a contract. Here are the specific circumstances where we use automated data processing:

- To generate your invoice
- To send an email confirmation of your order
- To send email notifications of the progress of your order
- To process your payment

You will only receive marketing, advertising and promotional materials from us if you have opted in on our Website. There will always be the ability to opt out, which will be clearly stated on any marketing material we send you.

#### **4. Sharing your information**

We may share your personal information with some categories of third parties. If we share your personal information to third parties, they will only legally be able to use it for the purpose of providing services to us. We will only share your personal information when needed to run or improve our services. We make sure that third parties we share personal information with follow equivalent privacy and security procedures to our own to protect your information. These third parties include: our service providers and sub-contractors (eg. payment providers, cloud service providers, technical and support services); companies that help us with our marketing and advertising; analytics and search engine providers that help us improve our Website and any third parties that you have agreed we may share your personal information with for marketing purposes.

Here is a list of third parties we use to help run our services and Websites.

- Infrastructure: Amazon Web Services (AWS), Wordpress
- Analytics: Google Analytics, Mixpanel
- Communications: Mailchimp, Intercom, Gmail, Sendgrid
- Payments: Stripe
- Blood testing services: Thriva

We carefully vet these services to make sure they meet our security and privacy standards.

We may anonymise and aggregate your data to create health reports and statistics. This may be used for marketing or shared with third parties for purposes of academic research. If we discuss case studies of people's experiences, we will always anonymise names, places and any other markers from which they might be identified. We are committed to contributing to improving the knowledge base about women's reproductive health.

Finally, we may also disclose your personal information to third parties in certain exceptional circumstances as follows:

- if we sell or buy any business or assets, we may disclose your personal information to the seller or buyer of that business or those assets;
- if Adia or most of our assets are acquired by a third party, in which case personal information held by Adia will be one of the transferred assets;
- if we are required by any applicable law or law enforcement organisation to do so;
- in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- to protect the rights, property, or safety of Adia, our customers or other persons. This includes if there is a risk of serious harm to you or others. This may include exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

If we transfer or store your information outside of the EEA, then we will take steps to inform you of this by outlining it in our Privacy Policy and taking all reasonable precautions to ensure privacy rights continue to be protected.

Except for what is written in this policy, we will never share any of your personal information to any third party without notifying you and/or getting your consent. If you do consent and later change your mind, you can remove consent and therefore our permission to use this information. See below for your rights to withdraw consent.

## **5. Your choices and rights**

You have a number of choices and rights in relation to your personal data.

At any time, you can:

- Choose not to provide us with personal data  
(Please note that if you do this we won't be able to provide our Services, even if you have already paid for them.)
- Turn off cookies in your browser settings  
(Please note this may make our online services less effective.)
- To opt out of us using your personal information for marketing  
(You can refuse to give your consent in the first place, or can opt out at a later date.)

You also have a number of rights in relation to your personal data. You can also contact us by email at [hello@adiahealth.com](mailto:hello@adiahealth.com) at any time, to request that we:

- cease sending email/ post communication (there will always be instructions on how to opt out on any communication from us).
- provide you with a copy of the personal data we hold on you (although we reserve the right to charge reasonable fee for this if requests are excessive or repetitive)
- update any personal information which is out of date or incorrect;
- restrict the way that we process your personal information;
- Transfer your data to another organisation (this is known as the right to data portability - when you engage this right it will relate to personal data only, and not any part of our service which constitutes our IP, commercially sensitive information or a trade secret)
- permanently delete your personal data (we will not delete personal information that we must retain in order to comply with our contractual or other legal obligations)

If you withdraw your consent to us processing your personal data, especially the special categories, this will likely mean that we are unable to provide our services to you. In addition, please remember that we will hold your data for 6 years after the contract comes to an end, this is to satisfy our obligations in relation to tax records and insurance

## **6. Making a complaint**

If you believe we have breached your rights, you can submit a complaint to [hello@adiahealth.com](mailto:hello@adiahealth.com). Your complaint will be investigated by our contact for Data Protection, Rose Acton, and will be dealt with efficiently.

You can also make a complaint to the UK Information Commissioner's Office (<https://ico.org.uk>) or seek remedy through your local courts. You can claim compensation for our breach of data protection laws.

## **7. Security**

At Adia, we have procedures in place to protect and secure the information we collect. We are committed to protecting personal information from loss, misuse, disclosure, alteration, unauthorised access and destruction and we take all reasonable precautions to safeguard the confidentiality of personal information. We make every effort to protect your personal information.

However, there is always an inherent risk, beyond our control, in sending information over the internet. If we do ever encounter any online data breaches, we commit to taking prompt action to resolve the situation to protect your information. We use Stripe for payment transactions and so do not hold payment or payment card data.

You are responsible for providing us with correct information and informing us when it needs to be updated.

Our Website may, from time to time, contain links to Websites operated by third parties. This Privacy Policy only applies to the personal information that we collect through this Website.

Our website may include links to third-party websites. By clicking on those links, you should be aware that it may enable third parties to collect or share data about you. We do not control those third-party websites and are not responsible for their data management. You should read the privacy notice of third-party websites for more detail.

Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **8. Cookies**

Some pages on our Website use cookies, which are small text files placed on your device (such as your computer, tablet or mobile phone) when you visit our Website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences. For more information, please see [www.allaboutcookies.org](http://www.allaboutcookies.org). There are a number of ways for you to manage cookies. Your browser settings should allow you to accept or reject cookies. You can also set your browser to prompt you before accepting a cookie as well as delete any cookies that have been installed in the cookie folder of your browser. If you disable cookies it may impact the performance of the Website.