

## PRIVACY POLICY

### Please Read This Privacy Policy Carefully

#### CONTACT DETAILS

Our full details are: PHC – Personalised Health Clinics

Full name of legal entity: Vumora Ltd

Title: N/A

Email address: hello@phclinics.com

Registered address: 90 Chapter Road, London, NW25LR

Postal address: 90 Chapter Road, London, NW25LR

PHC is the controller and responsible for your Personal Data (collectively referred to as “we”, “us” or “our” in this Privacy Policy).

This Privacy Policy is issued on behalf of PHC so when we mention PHC, “we”, “us” or “our” in this Privacy Policy, we are referring to the relevant company in the PHC group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. PHC is the controller and responsible for this website.

This Privacy Policy sets out how we use and protect any information that you give us when you use this website.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, you can be assured that it will only be used in accordance with this Privacy Policy.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This Privacy Policy was last updated on the 20<sup>th</sup> June 2024.

#### What we collect

We may collect the following information:

- Identity Data: Name
- Contact Data: Contact information including email address and telephone number
- Demographic information such as postcode and preferences
- IP addresses
- Other information relevant in relation to our customer surveys and/or offers
- Technical Data includes anonymised internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform – Stored by Google Analytics on the devices you use to access this website.
- Marketing and Communications Data
- Usage Data including the amount of time you use our website in a given set of time
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can

directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this Privacy Policy.

#### 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 we have or are trying to enter into with you (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.

#### How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your identity, contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:

- Create an account on our website
- Subscribe to our service or publications;
- Request marketing;
- Request product/service support;
- Entering a competition, promotion or survey; or
- Give feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our Cookies.

Third parties or publicly available sources. We may receive Personal Data about you from various third parties and public sources. We currently only use Google Analytics (with anonymised feature) Technical Data.

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our Legitimate Interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Under a Performance of Contract. Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Where we need to comply with a legal or regulatory obligation.

## What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone or mail. We may use the information to customise the website according to your interests.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our Legitimate Interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of Legitimate Interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a Contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a Contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our Legitimate Interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a Contract with you (b) Necessary for our Legitimate Interests (to study how customers use our products/services, to develop them and grow our business)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our Legitimate Interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our Legitimate Interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/ services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our Legitimate Interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

How we use cookies

A cookie is a small file, which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website however.

#### Links to other websites

Our website may contain links to other third party websites of interest. However, once you have used these links to leave our website, you should note that we do not have any control over that other third party websites. Therefore, we cannot be responsible for the protection and privacy of any information, which you provide whilst visiting such sites and such websites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question We do not control these third-party websites and are not liable for their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

#### Cookies used on our sites

<b>Cookie – Universal Analytics (latest version)</b>	<b>What we use them for</b>
<code>_ga</code>	This is used by Analytics to calculate visitors, session, campaign data, etc. Expiration time is set to two (2) years and it resets each time when a visitor hits a page. No personal information or data is stored. Used to distinguish users. This cookie enables us to estimate our audience size and usage pattern See web link below: <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
<code>_gat</code>	Described by Google as “Used to throttle request rate”(no more information is available about this cookie). Expires in ten (10) minutes. This cookie enables us to limit the number of times information is recorded. See web link below: <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
<code>_gid</code>	This is used to distinguish users but has a 24 hours expiration time. See web link below: <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>

#### How to manage cookies

Our cookies do not store financial information, or information which is capable of directly identifying you (such as your name or address). Cookies simply allow our website to retrieve this information in order to personalise and improve your experience of our website.

However, if you wish to restrict, block or delete cookies provided by our site – or any other website – you can use your browser to do this. Each browser is different so check the ‘Help’ menu of your particular browser to learn how to change your cookie preferences, or use the following weblinks:

Microsoft Internet Explorer

Help: <http://support.microsoft.com/?ln=en-gb>

How to manage Cookies in IE 11:

<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Mozilla Firefox

Help: <http://support.mozilla.org/en-US/home?as=u>

Cookies: <http://support.mozilla.org/en-US/kb/Cookies?s=manage+cookies&r=0&e=es&as=s>

Google Chrome

Help: <http://support.google.com/chrome/?hl=en-GB>

Manage Cookies: <http://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647>

Our analytics partner also provides the ability for users to opt-out using the following links:

Google Analytics:

<https://tools.google.com/dlpage/gaoptout>

Further information on cookies is available online at: [www.aboutcookies.org](http://www.aboutcookies.org)

Please bear in mind that if you do this, certain personalised features of this website and others cannot be provided to you.

### Third Party Cookies

To help improve your experience of our site we use content from other sites to help users and improve usability for example Google Maps for store locators. We also use social sites such as Facebook and Twitter to allow businesses to communicate with their clients along with analytics to help improve user experience. We do not control these social media websites and we suggest you read their cookie policy to see which ones they use and how to manage them.

<b>Third-party cookies</b>	<b>What we use them for</b>
Google	We use Google Maps to show our location. Google's privacy policy: <a href="http://www.google.co.uk/intl/en/policies/privacy/">http://www.google.co.uk/intl/en/policies/privacy/</a>
Social Tools	We take advantage of social networks and like to share our content with friends across these networks, such as Instagram you may receive cookies from these websites. We are not in control of these third-party cookies, if you'd like to learn more about them – visit their websites.
Facebook	<a href="https://www.facebook.com/privacy/explanation">https://www.facebook.com/privacy/explanation</a>
Twitter	<a href="https://twitter.com/en/privacy">https://twitter.com/en/privacy</a>
YouTube	<a href="https://www.youtube.com/static?gl=GB&amp;template=terms">https://www.youtube.com/static?gl=GB&amp;template=terms</a>

### Controlling your personal information

We take advantage of social networks and like to share our content with friends across these networks, such as Instagram, you may receive cookies from these websites. We are not in control of these third-party cookies, if you'd like to learn more about them – visit their websites

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes.
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time and can contact us to let us know

We will get your express opt-in consent before we share your personal data with any company outside the PHC group of companies for marketing purposes.

### Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### Change 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 and that reason is compatible with the original purpose. If you wish to get an explanation as to 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 we will explain the legal basis, which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

Internal Third Parties. Other companies in our group acting as joint controllers or processors and provide IT and system administration services and undertake reporting.

External Third Parties. Including service providers acting as processors or hosts who provide IT and system administration services and service agents for support and delivery companies for the transportation of products.

Professional advisers acting as processors or joint controllers including solicitors, barristers, bankers, auditors and insurers based in the United Kingdom or EEA who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Government Agencies for example for fraud or illegal activities.

Third parties to whom we may choose to sell, transfer, or merge parts or all of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

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 our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### Data retention

How long will you use my personal data for?

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

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

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six (6) years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data: see Request erasure of your personal data, below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### International transfers

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

Where we use certain service providers, we may use specific contracts approved by the European Commission, which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as listed below:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- **Object to processing of your personal data** where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine readable format. Note that 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.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Please email us on [hello@phclinics.com](mailto:hello@phclinics.com) if you wish to exercise any of these rights.

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

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 any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

We try to respond to all legitimate requests within thirty (30) calendar days from the date of receipt of your request. Occasionally it may take us longer, if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Where you are sending us a request via post rather than email we recommend you send it via recorded delivery to guarantee safe delivery.

### ICO, Data Protection Act 1998 and GDPR

We adhere to the following principles:

- a. access to your information is restricted to our relevant trained staff only;
- b. where any hard copies are created, the hard copies of your information and confidential documents are kept securely under lock and key.

We have registered with the ICO and adhere to the following principles:

- a. All our relevant employees have received training in how to handle your information. This includes ensuring they are aware of the importance of handling your information safely and securely, and understanding the procedures in place to ensure this happens.
- b. We will periodically evaluate our database and securely delete any contacts no longer engaged or any information no longer needed by us.
- c. We have measures in place to keep your information we hold safe and secure.
- d. All personal information is transferred by secure email to secure servers on site to which access is only granted to key personnel. Where your information is downloaded to be updated, and as a backup to the cloud, it is only stored on personal drives, only accessible via individual log in.

### Severability

If a court finds part of this Privacy Policy illegal, the rest will continue in force. Each of the clauses of these terms operates separately. If any court or relevant authority decides that any of them are unlawful, the remaining clauses will remain in full force and effect.

### Partnership

Nothing herein contained shall give rise to a partnership or a contract of employment between you and us.

### Assignment

You may not assign, mortgage or otherwise transfer this Privacy Policy, data or any rights, duties and obligations hereunder. It is acknowledged by you that we may use our employees, officers, representatives or third party consultants to carry out our work within this Privacy Policy. We may assign the benefit of this Privacy Policy, data or any rights, duties or obligations to any firm or company in which we hereafter acquire a controlling interest or which acquires a controlling interest in us without prior approval from you. Save that we shall remain primarily liable hereunder until such time as the prospective assignee enters into an agreement to fulfil our obligations hereunder.

### Waiver

No waiver or affirmation of any breach of or non-compliance with any term hereof by the parties shall be deemed to be a waiver or affirmation of any preceding or succeeding breach of or non-compliance with the same or any other term.

### Third parties

Save to the extent expressly set out herein, this Privacy Policy and is not intended to nor shall it create any rights, entitlements, claims or benefits enforceable by any person that is not a party hereto. Accordingly, save to the extent expressly set out in this Privacy Policy, no person shall derive any benefit or have any right entitlement or claim in relation to this agreement by virtue of the Contract (Rights of Third Parties) 1999.

### Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the laws of England. The parties irrevocably agree that the English Courts shall have exclusive jurisdiction to settle any dispute arising out of or in connection with this Privacy Policy.

### Further information

If you wish to learn more information or have a question about your Personal Data or cookies please email us on [hello@phclinics.com](mailto:hello@phclinics.com) with the title of your question in the email header.