

## AMC02 - GDPR, PRIVACY, DATA POLICY AND DATA SHARING POLICY

At Ada & Me, your privacy is our top priority. This privacy policy explains what information we collect, what we do with that information, who we share it with and how long we keep it.

This Privacy Notice applies to your **Personal Data** processed by us, whether in physical or electronic mode. We process any Personal Data we collect from you in accordance with the applicable laws and regulations and the provisions of this Privacy Notice. Please read the following carefully to understand our views and practices regarding your Personal Data and how we treat it.

This Privacy Notice is published in compliance with the following privacy laws: UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Please note that this Privacy Notice is applicable to instances where we play the role of **Data Controller** of your Personal Data, which we get from you on your visit to our website and when you provide it to us for registration or when you visit our premises. We may at times play the role of a **Data Processor** too, when we process Personal Data on behalf of another organisation. In that case, the Privacy Notice of that organization becomes applicable to your Personal Data.

Ada & Me is committed to keeping your Personal Data private.

### WHO ARE WE AND WHAT DO WE DO?

Ada & Me provides a breast screening service, powered by an artificial intelligence-based medical device called **Thermalytix®** which has all the necessary regulatory approvals in UK. The service is designed to detect potential abnormalities in breast tissue at a much earlier stage compared to traditional screening methods or self-examinations. Unlike mammograms, our AI technology is radiation-free, making screenings safer, repeatable and more accessible for everyone. There is no compression nor discomfort and screening is conducted in a completely private setting so no-touch and no-see and works for people of all ages.

The core technology underpinning the service is a patented machine learning algorithm that has demonstrated reliable and accurate anomaly detection in breast tissue. The technology has been tested on over 200,000 women in India and has undergone extensive medical trials in that context. In India, the false-negative rate is less than 5%, and the false-positive rate is less than 10%. However, Ada & Me cannot guarantee the same accuracy rates here in the United Kingdom, as these figures are based on studies conducted in Indian populations.

Thermalytix® has obtained a CE Mark for all European countries. Niramai Quality Management Processes, registered in India, are certified to be compliant with ISO 13485 and MDSAP. Thermalytix® is registered with MHRA, reference number 25957.

Throughout this document, the terms “we”, “us”, “our” & “ours” refer to Ada & Me. And the terms “you”, “your” & “yours” refer to YOU (as the Data Subject).

## DEFINITIONS IN THIS PRIVACY POLICY

**Anonymous Data** – when a natural person is not or no longer identifiable

**ACP** – Ada Customer Platform

**Cookies** – small text files that websites place on your device as you are browsing. They are widely used in order to make websites work, or work more efficiently, as well as to provide information about your actions to the owners of the website.

**Data Controller** – determine how personal data is processed and must comply with strict UK GDPR rules

**Data Processor** – processes personal data on behalf of the data controller

**Personal Data** – any information relating to an identified person. This includes names, location data, online identifiers and other factors specific to an individual’s identity

**Services** – means the services made by Ada & Me as laid out on the website

**Thermal Images** – visual output produced by thermal imaging that are captured using specialised device

**Thermalytix®** – A computer aided diagnostic engine powered by Artificial Intelligence using a high resolution thermal sensing device and a cloud hosted analytics solution for analysing the thermal images for reliable, early and accurate breast cancer screening.

**Third Parties** – a natural or legal person, public authority, agency or body other than the data

## WHAT PERSONAL DATA DO WE COLLECT & PROCESS?

When you visit our website, we collect, store, and process Personal Data. This can be used to provide and improve our website, mobile applications, and our **Services**.

Categories of Personal Data that we may collect and process are as follows: –

- Your Thermal Image (for e.g. your breast scan image taken for abnormality detection)
- Demographic & Identity Data (for e.g. name, email address, contact number, postcode)
- Communication Data (for e.g. message sent, details about queries)
- Financial Data (for e.g. Payment method, payment details, transaction details)
- Online Identifiers and other Technical Data (for e.g. IP address, cookie details)

- Opinions, Preferences, Interests Data (for e.g. customer feedback, survey responses)
- Special Category of Data (for e.g. Health Information, Medical History)

When you create an account with us, we will collect, process, and share your Personal Data (including your Thermal Images if they have been taken by us) as described in this Privacy Statement.

#### **WHERE DO WE OBTAIN YOUR PERSONAL DATA FROM?**

Most of the Personal Data we process is provided by you directly to us when you use our products and/or services. This also includes the Personal Data collected automatically and indirectly by us when you use our website and application(s).

We collect your thermal image when you attend our screening services

We may also receive Personal Data about you from third parties and publicly available sources of information.

#### **HOW DO WE USE YOUR PERSONAL DATA?**

We use your Personal Data for the following purposes:

- 1) To verify your identity and to maintain the personal data record
- 2) To deliver our products and services
- 3) To communicate with you regarding products and services that you may be interested in, including notifications of any alerts or updates
- 4) To evaluate, develop and improve our products and services
- 5) For market and product analysis and market research
- 6) To send you information about our other products or services which may be of interest to you
- 7) To handle enquiries and complaints
- 8) To comply with legal or regulatory requirements
- 9) To investigate, prevent, or take action regarding illegal activities, suspected fraud and situations involving potential threats to the safety of any person
- 10) To detect abnormalities in your breasts
- 11) Develop the technology for future research purposes

#### **LAWFUL BASES OF PROCESSING YOUR PERSONAL DATA**

We process your Personal Data by relying on one or more of the following lawful bases:

- 1) You have explicitly agreed to/consented to us processing your Personal Data for a specific reason
- 2) The processing is necessary for the performance of the contract we have with you or to take steps to enter into a contract with you
- 3) The processing is necessary for compliance with a legal obligation we have

4) The processing is necessary for the purposes of a legitimate interest pursued by us

Where the processing is based on your consent, you have the right to withdraw your consent at any point in time. Please note that should the withdrawal of consent result in us not being able to continue offering our products and services to you, we reserve the right to withdraw or cease our products and services to you upon your withdrawal. You may withdraw consent by contacting us with a written request to the contact details specified below in the 'Contact Us' section or within our **ACP**. Upon receipt of your request to withdraw your consent, the consequences of withdrawal will be communicated to you. Upon your agreement to the same, your request for withdrawal will be processed (within 14 working days).

### **WHEN DO WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?**

We will never sell your Personal Data. We may use third parties in the provision of our products and services to you. We may share your Personal Data with such third parties. We may share **Anonymous Data** with **Third Parties** for providing our Services. We have appropriate contracts in place with all such third parties. This means that they are not permitted to do anything with your Personal Data which is outside of the scope specified by us. They are committed to hold your Personal Data securely and retain it only for the period specified in our contracts with them.

#### **1) Reasons for sharing your Personal Data with third parties:**

We may disclose your Personal Data to third parties only where it is lawful to do so. This includes instances where we or they:

- need to provide you with products or services
- have asked you for your consent to share it, and you have agreed
- have a legitimate business reason for doing so
- have a legal obligation to do so. For e.g., to assist with detecting and preventing fraud
- have a requirement in connection with regulatory reporting, litigation or asserting or defending legal rights and interests

We may also disclose your Personal Data to appropriate authorities if we believe that it is reasonably necessary to comply with a law, regulation, legal process; protect the safety of any person; address fraud, security, or technical issues; or protect our rights or the rights of those who use our products & services.

#### **2) With whom your Personal Data may be shared:**

We may disclose your Personal Data to the following third parties:

- any sub-contractors, agents or service providers who work for us or provide services or products to us such as Niramai PVT

- law enforcement authorities, government authorities, courts, dispute resolution bodies, regulators, auditors and any party appointed or requested by applicable regulators to carry out investigations or audits of our activities
- statutory and regulatory bodies, authorities (including the government) investigating agencies and entities or persons, to whom or before whom it is mandatory to disclose Personal Data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals

## **CROSS-BORDER DATA TRANSFER**

Personal Data we hold about you may be transferred to other countries outside your residential country for any of the purposes described in this Privacy Notice.

Please note that these countries may have differing (and potentially less stringent) privacy laws and that Personal Data can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process.

Any information collected is processed in the UK but Niramai PVT will be reviewing the results in India along with your personal medical data to review the accuracy of your results. Whilst we reserve all the above information, we will share your anonymised data for an accurate report to be produced.

## **USE OF COOKIES AND OTHER TRACKING MECHANISMS**

We may use **cookies** and other tracking mechanisms on our website and other digital properties to collect data about you.

Most web browsers allow you some control of cookies through browser settings.

Outlined below are the categories of cookies along with a description of what they are used for.

- **Strictly Necessary Cookies** – These cookies are needed to run our website, to keep it secure and to comply with regulations that apply to us.
- **Functional Cookies** – We may use functional cookies on our website. These cookies allow us to remember information you enter or choices you make (such as your username, language, or your region) and provide you with enhanced, more personalized features.
- **Performance/Analytics Cookies** – We may use performance/analytics cookies on our website. These cookies collect information about how visitors use our website and services, including which pages visitors go to most often and if they receive error messages from certain pages. It is used to improve how our website functions and performs.

- Marketing Cookies – We may use marketing cookies on our website. These cookies help us decide which of our products, services and offers may be relevant for you. We may use this data to tailor the marketing and ads you see on our own and other website and mobile apps, including social media. For instance, you may see our ads on other sites after you have been to our website.

We may also use trackers (such as web beacons, tags, pixels) on our website and other digital properties to collect data about you.

### **HOW DO WE SECURE YOUR PERSONAL DATA?**

We are committed to protecting your Personal Data in our custody. We take reasonable steps to ensure appropriate physical, technical and managerial safeguards are in place to protect your Personal Data from unauthorised access, alteration, transmission and deletion. We ensure that the third parties who provide services to us under appropriate contracts take appropriate security measures to protect your Personal Data in line with our policies.

### **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We keep the Personal Data we collect about you for as long as it is required for the purposes set out in this Privacy Notice and for legal or regulatory reasons. We take reasonable steps to delete or permanently de-identify your Personal Data that is no longer needed. We only keep Personal Data for as long as relevant and we ask if we should retain/remove your account and data.

| <b>Information Category</b> | <b>Retention Period</b>   |
|-----------------------------|---|
| Account and Profile         | We will retain the Personal Data you provide while creating your account and your profile until such time as you delete your account where we will retain your anonymised data to support the development of the product.   |
| Your Thermal Images         | We retain your Thermal Images while there is value to better understand population related health, wellness, aging or physical conditions. However, we permanently de-identify your images for these purposes.  |
| Usage Information           | We retain usage information (e.g. visits to sites) in a depersonalised form. This is to improve features and functionality in our existing products, enhancing the customer experience across the services, improve the quality of our processes and technology, and build new products and services. This information ceases to be personal information and will not be subject to user deletion requests. |

## **CHILDREN'S PRIVACY**

We do not knowingly collect Personal Data from children. If you are a parent or guardian and aware that your Child has provided us with Personal Data, please contact us using the details in the 'Contact us' section of this notice. However, where a child is referred to us for screening this will only be carried out within the guidelines of a competent authority.

## **LINKS TO OTHER WEBSITES**

Our website may contain links to websites of other organisations. This privacy notice does not cover how those organizations process your Personal Data. We encourage you to read the privacy notices on the other websites you visit.

## **CONTACT US**

For any further queries and complaints related to privacy, or exercising your rights, you could reach us at:

Contact Email Address: [contact@adaandme.co.uk](mailto:contact@adaandme.co.uk)

Our grievance redressal officer details are: Mr. Mark Wakeford. Please contact him by email at: [mark.wakeford@adaandme.co.uk](mailto:mark.wakeford@adaandme.co.uk).

## **NOTIFICATION OF CHANGES**

We regularly review and update our Privacy Notice to ensure it is up-to-date and accurate. The current version of this will be available on our website.

## **YOUR PRIVACY RIGHTS**

If you are an UK resident, under the GDPR, you have the following rights and we commit to provide you with the same:

- Right of Access: You have the right to get access to your Personal Data that is with us along with other supporting information. This will only be retained in your personal account.
- Right to Rectification: You have the right to ask us to rectify your Personal Data that is with us that you think is inaccurate. You also have the right to ask us to complete your Personal Data that you think is incomplete.
- Right to Erasure: You have the right to ask us to erase your Personal Data that is with us under certain circumstances.
- Right to Restriction of Processing: You have the right to ask us to restrict the processing of your Personal Data under certain circumstances.
- Right to Data Portability: You have the right to ask that we transfer the Personal Data you gave us to another organization, or to you, under certain circumstances.

- Right to Object: You have the right to object to the processing of your Personal Data under certain circumstances.
- Right to not be subjected to Automated individual decision-making, including profiling
- Right to lodge a complaint with the ICO (Information Commissioner's Office): You have the right to lodge a complaint or get advice from the ICO.

If you wish to make a request to exercise any of your rights, you can contact us using the details in the 'Contact us' section of this notice.

By clicking on 'I accept this Privacy Policy' you indicate you have read and agree to the terms present in this policy.