

PRIVACY POLICY

HEALOME THERAPEUTICS LTD ("**Healome**" / "**we**" / "**our**" / "**us**") is committed to protecting the privacy and security of your personal information. This policy sets out the basis on which we will collect your personal data, and how that data will be used.

This policy applies to personal data we collect when you use our website www.healometx.com (the "**Website**") or otherwise interact with us.

Please read this policy carefully to understand how we will treat your personal data. We have a duty to process personal data fairly, lawfully and in a manner that you would expect given the nature of our relationship with you. Where we have a legal basis to use your personal data without consent, this policy fulfils that duty by giving you appropriate notice and explanation of the way in which your personal data will be used.

If you have any questions or require any further information regarding our use of your personal data please contact us at info@healometx.com

1. ABOUT US

HEALOME THERAPEUTICS LTD is a company registered in England and Wales under company number whose registered office is at Birmingham Research Park, 97 Vincent Drive, Birmingham, England, B15 2SQ. Healome is the data controller in respect of your personal data. This means that we are responsible for deciding how we hold and use personal data about you.

2. WHO THIS POLICY APPLIES TO

The information we collect depends on the context of your interactions with us. In this Privacy Policy, we consider the following groups of people:

- (a) Visitors to our Website
- (b) Website visitors who complete a Contact Form

You may fall into one or more of these groups, and these categories may change over time. The information we collect, and the way it is used, will depend on which of these groups you fall into.

3. WHAT INFORMATION WE COLLECT AND HOW WE WILL USE IT

We collect personal data so that we can operate effectively and provide you with the best possible service. We will only use your personal data where we have a valid lawful basis to do so.

Accessing our Website

We may collect the following information when you access our Website:

- **Device and usage data including IP addresses and device identifiers**
- **Device event information including crash logs, hardware settings, browser type and browser language**
- **Location information**

- **Cookies and similar technologies**

This data is automatically collected and stored in our server logs when you interact with our website. Collecting this data enables us to improve user experience of our website, for example to provide you with tailored content. It also helps us to understand how our website is used, by analysing the traffic we receive, and to maintain and protect the security of our website and products. Our Cookie Policy explains this in more detail and can be found at the bottom of our homepage www.healometx.com .

The legal basis for collecting this information is our legitimate interest in improving our website and protecting our rights.

Filing out a contact form

We may collect the following information when you use our contact form to raise a query with us.

- **Your name, email address and phone number:** as required for the contact form.
- **Any feedback, questions or comments you send to us:** to enable us to respond to your questions and provide information to you.

Collecting this data enables us to communicate with you in response to your completion of a contact form.

Our legal basis for collecting this information is to enable us to respond to you, and our legitimate interest in responding to questions in relation to our services and protecting our rights.

4. 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. 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.

5. SHARING YOUR INFORMATION

You acknowledge that we may share your personal data with your consent or as necessary with selected third party service providers and other companies within our group that support us in the performance of the activities set out above.

We may also share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or otherwise to comply with the law.

We require all our third party service providers to take appropriate and stringent security measures to protect your personal data in line with our policies. 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 in accordance with our instructions.

6. STORING YOUR INFORMATION

The personal data that we hold about you will only be processed and stored within the United Kingdom/EEA.

We will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting obligations. Unless we inform you otherwise (or you request that we erase your personal data) we will retain your personal data for as long as we continue to communicate with you in relation to your query. If we do not communicate for a period of 12 months, then we will delete your information. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

7. KEEPING YOUR INFORMATION SECURE

All information that you provide to us is stored on secure servers. We have put in place appropriate measures to protect the security of your information.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of the information transmitted to our site and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access or inadvertent disclosure.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

Under certain circumstances, by law you have the right to:

- (a) **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- (b) **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- (c) **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- (d) **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

- (e) **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - (f) **Request the transfer** of your personal information to another party.
- 1.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact info@healometx.com

1.3 **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 for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

1.4 **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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data are not disclosed to any person who has no right to receive it.

9. **OTHER WEBSITES**

Our website may contain links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

10. **CHANGES TO THIS PRIVACY POLICY**

We keep our privacy policy under regular review and will post any updates on this webpage. This privacy policy was last updated in March 2022.

11. **HOW TO CONTACT US AND COMPLAINTS**

- 11.1 If you have any questions about this privacy policy or how we handle your personal data please contact us at info@healometx.com.
- 11.2 If for any reason you are not happy with the way that we have handled your personal data, please contact us at the contact details above. If you are still not happy, you have the right to make a make a complaint to the Information Commissioner's Office see: <https://ico.org.uk/global/contact-us/>.