



Salve Technologies Patient Privacy Policy

Last Updated: 12 February 2024

Salve Technologies Limited, its subsidiaries and affiliates (collectively, “**Salve**”, “**we**”, “**our**” or “**us**”) respect the privacy of our users (“**you**” or “**user**”). This Privacy Policy (“**Policy**”) describes how we collect, process, share and safeguard Personal Information we collect from you, or that you provide to us, in connection with your use of our online services for health management available through our mobile application and web application (the “**Services**”). It also tells you about your rights and choices with respect to your Personal Information, and how you can contact us if you have any questions or concerns.

This Policy applies to the activities for which Salve is a “data controller” which means that Salve determines the purpose and means of the processing of your Personal Information. We may also process and collect Personal Information as “data processor” when providing our Services to our customers (for example, your clinic or health institution) (“**Customers**”) who may encourage you to use our Services. In that context we process your Personal Information on behalf of and upon the instructions of such Customers as data controllers and their privacy policies will apply to the processing of your Personal Information. We encourage you to read their privacy policies as they will provide information on what these entities do with the Personal Information you share with them. Details on when we might share information with third parties is described in paragraph 4: “*Who We Share Your Information With*”.

Please read this Policy carefully. If you do not agree with this Privacy Policy or any part thereof, you should not access or use any part of the Services. If you change your mind in the future, you must stop using the Services and you may exercise your rights in relation to your Personal Information as set out in this Policy.

1. Personal Information We Collect

We collect Personal Information about you from the different sources listed below. In this Policy, “**Personal Information**” means any information related to an identified or identifiable individual and does not include data whereby personally identifiable information has been removed (such as anonymous data). Where applicable, we will indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide your Personal Information, when requested, you may not be able to benefit from our Services if that information is necessary to provide you with them or if we are legally required to collect it.

Information Provided by You

- **Registration information.** When you register for our Services, you will need to provide us with Personal Information, such as your name, email address, telephone number, country, date of birth and password.
- **User content.** Certain features of the Service may permit you to upload and provide us with content including messages, reviews, documents, photos, video, images, folders, data, text, and other types of works.

Information Collected from Other Sources

- **Information from Customers.** We may obtain Personal Information about you from our Customers including, but not limited to, your specific treatment regimen, including drugs, dosage, timings, your adherence to the regime, details of missed or duplicated dosages, time taken to resolve missed or duplicated treatments or changes to regime, details of your appointments and documents relating to you.

2. How We Use Personal Information

We will use your Personal Information for one or more of the following purposes:

- **Providing you or the Customer with the Services.** We use your Personal Information to operate, maintain and provide you with the Services. In particular we will use your Personal Information to perform our contractual obligation towards you or our Customers, to allow you to create an account, upload your content, browse the Services, send you push notifications and (operational) text messages concerning your use of the Services and to contact you in case of any issue with your account. The Personal Information we process when doing so includes your registration and user information.
- **Providing you with support and to respond to your requests and complaints.** If you reach out to us for support, we will perform our contractual obligations to you by using your Personal Information to respond and resolve your queries and facilitate support. The Personal Information we process when doing so includes your correspondence with us, your name, contact details, and, to the extent applicable to your query or complaint, device settings and transaction and usage information.
- **Improve or monitor usage of our Services.** It is in our legitimate interests to improve our Services for our users, which includes conducting troubleshooting, testing and research and to keep the Services secure. When doing so we may use Personal Information that we automatically collect about you, such as identifiers and information on use.

- **To monitor and analyse trends and use of our Services.** It is in our legitimate interests to analyse the use of our Services. When doing so, we will process Personal Information that we automatically collect about you or that is generated about you when you use the Services.
- **To enforce the Salve Terms and Conditions, to comply with legal obligations and to defend Salve against legal claims or disputes.** It is in our legitimate interests to enforce our terms and policies, to ensure the integrity of our Services and to defend ourselves against legal claims or disputes. Where we do so, we will use the Personal Information relevant to such a case. Some processing may also be necessary to comply with a legal obligation placed on Salve, for example to keep records of transactions.

3. Our Lawful Basis

Where we process any of your Personal Information for the purposes detailed above, we will only do so where we have a lawful basis which applies to that processing. The relevant lawful basis for each use is detailed in the table below:

Purpose	Lawful basis for processing
Providing you or the Customer with the Services.	Performance of a contract with you
Providing you with support and to respond to your requests and complaints.	Performance of a contract with you Necessary for our legitimate interests
Aggregate Personal Information.	Necessary for our legitimate interests
Improve or monitor usage of our Services.	Necessary for our legitimate interests
To monitor and analyse trends and use of our Services.	Necessary for our legitimate interests
To enforce the Salve Terms and Conditions, to comply with legal obligations and to defend Salve against legal claims or disputes.	Performance of a contract with you Necessary for our legitimate interests Legal obligation

4. Who We Share Your Information With

We will never share your Protected Health Information with any third party, other than for the purposes of delivering the Services. We disclose Personal Information about you with the following recipients and in the following circumstances where it is necessary as part of our lawful basis for processing:

- **Vendors and service providers.** We rely on vendors and service providers for the provision of our Services, such as:
 - Cloud service providers who we rely on for data storage, disaster recovery and to perform our obligations to you, *such as Amazon Web Services*;
 - Analytics providers who help us to understand our user base and how our Services are used, *such as Google Analytics*; and
 - Providers of business communication tools, such as Twilio and Slack.
- **Payment processors.** We disclose your information to payment processors in order to receive payment for the use of our Services, such as Stripe.
- **Tools and features to third party services.** Salve may provide tools through the Services that enable you to export information, including user content, to third party services. By using one of these tools, you agree that Salve may transfer that information to the applicable third-party service.
- **Salve group.** We share Personal Information about you with our affiliates and subsidiaries within the Salve group. We do this so we can manage the services we provide to you and our Customers.
- **Legal.** Information about our users, including Personal Information, will be disclosed to law enforcement agencies, regulatory bodies, public authorities or pursuant to the exercise of legal proceedings if we are legally required to do so, or if we believe, in good faith, that such disclosure is necessary to comply with a legal obligation or request, to enforce our terms and conditions, to prevent or resolve security or technical issues, or to protect the rights, property or safety of Salve, our users, a third party, or the public.
- **Change of corporate ownership.** If we are involved in a merger, acquisition, bankruptcy, reorganisation, partnership, asset sale or other transaction, we may disclose your Personal Information as part of that transaction.

5. Your Rights and Choices

In certain circumstances, you have the following rights in relation to your Personal Information that we hold.

- **Access.** You have the right to access the Personal Information we hold about you, and to receive an explanation of how we use it and who we share it with.

- **Correction.** You have the right to correct any Personal Information we hold about you that is inaccurate or incomplete.
- **Erasure.** You have the right to request for your Personal Information to be deleted.
- **Object to processing.** You have the right to object to our processing of your Personal Information where we are relying on a legitimate interest.
- **Restrict processing.** You have a right in certain circumstances to stop us processing your Personal Information other than for storage purposes.
- **Portability.** You have the right to receive, in a structured, commonly used and machine-readable format, Personal Information that you have provided to us if we process it on the basis of our contract with you, or with your consent, or to request that we transfer such Personal Information to a third party.

Please note that the rights described above are not absolute, and that your requests cannot always be met entirely. For example, under specific circumstances we may not be able to delete or restrict the processing of your Personal Information as we may have legal obligations or contractual obligations to keep certain information.

You will not have to pay a fee to access your Personal Information (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 could refuse to comply with your request in these circumstances.

If you are using our Services at the direction of one of our Customers, please contact this Customer directly to exercise your rights. You can also contact us at hello@salveapp.co.uk and we will direct and forward any requests we receive as appropriate to our Customer and collaborate with this Customer to address your request if necessary.

Please note that, prior to any response to the exercise of such rights, we will require you to verify your identity. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month 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.

6. Change of Purpose

We will only use your Personal Information for the purposes for which we collected it and as set out in this Privacy Policy.

If we need to use your Personal Information for any other purpose, we will notify you and we will explain the lawful basis which allows us to do so.

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

7. Cross-Border Data Transfers

For the purpose of authentication your email address and phone number are processed in our central authentication database in AWS London. This means that this type of Personal Information will be transferred to London which may involve a transfer to a different country depending on where you live.

All other Personal Information we retain is held in the AWS (Amazon Web Services) region in which your clinic or healthcare organisation operates. When we make any transfer to a third party in a different country within this region, we will ensure that relevant safeguards are in place to afford adequate protection for your Personal Information.

If you would like further information on the specific mechanisms used by us, the AWS region which applies to you or the relevant safeguards we have in place, this can be obtained from us on request.

8. Children's Privacy

Personal Information on children under the age of 18 is only collected in exceptional circumstances and with a wide range of consents, permissions and safeguards in place. In all other cases, we do not process Personal Information relating to children.

9. Data Retention

Salve stores all Personal Information for as long as necessary to fulfil the purposes set out in this Policy, or for as long as we are required to do so by law or in order to comply with a regulatory obligation. When deleting Personal Information, we will take measures to render such Personal Information irrecoverable or irreproducible, and the electronic files which contain Personal Information will be permanently deleted.

10. Data Security

We use certain physical, managerial, and technical safeguards that are designed to improve the integrity and security of Personal Information that we collect and maintain. However, the transfer of Personal Information through the internet will carry its own inherent risks and we do not guarantee the security of your data transmitted through the internet. You make any such transfer at your own risk.

Our Services may contain features or links to websites and services provided by third parties. Any information you provide on third-party websites or services is provided directly to the operators of such websites or services and is subject to those operators' policies governing privacy and security. We are

not responsible for the content or privacy and security practices and policies of third parties to which links or access are provided through our Services. We encourage you to learn about third parties' privacy and security policies before providing them with your Personal Information.

11. Changes to this Policy or your information

We keep our policies and practices under regular review. This policy was last updated in May 2023 and previous versions can be obtained by contacting us. With respect to future updates, we will notify you of any material changes so that you have time to review the changes.

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us.

12. Complaints

Please contact your clinic or health institution if you are using our Services at the direction of your clinic or health institution and wish to lodge a complaint about how your Personal Information is processed. Otherwise, please contact us at hello@salveapp.co.uk. We will endeavour to respond to your complaint as soon as possible. You may also lodge a claim with the relevant data protection supervisory authority in your country.

13. Our Contact Information

If you have any questions or comments about this Policy, our privacy practices, or if you would like to exercise your rights with respect to your Personal Information, please contact us by email at hello@salveapp.co.uk.

Please write to us at: Salve Technologies Limited, Nottingham Business Park, John Webster House, 6 Lawrence Dr, Nottingham NG8 6PZ