



HABITUS HEALTH LIMITED

Privacy Policy for Habitus Health

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This privacy policy sets out how Habitus Health Limited (owners of HABITUS HEALTH) a company registered in Ireland, collects and uses the personal data you provide to us. This Privacy Policy describes what personal data we collect about you, how we collect it, how we use it, with whom we may share it, and what choices you have regarding our use of your personal data. We also describe the measures we take to protect the security of your personal data and how to contact us. You have the right to review our data protection policy prior to providing Habitus Health LTD with any of your personal data.

We encourage you to read this Privacy Policy carefully and, in its entirety, as it relates to your rights regarding the processing of your personal data. As a user of our Services, you understand and agree that we collect, use, and disclose your personal data in accordance with this Privacy Policy.

Habitus Health LTD materially complies with applicable laws in the jurisdictions in which it operates, including the Regulation (EU) 2016/679 General Data Protection Regulation (GDPR) by May 25, 2018, in its handling of personal data of persons in the European Economic Area. It is in our legitimate business interests to provide you with the Services which use the personal data provided to us for the purposes described herein.



We will be a “data controller” for the purposes of the General Data Protection Regulation 2016/679 (“GDPR”) for any personal information you provide to us in connection with our relationship.

We need to collect, use and disclose personal information in order to perform our business functions and activities. We are firmly committed to protecting the privacy and confidentiality of personal information and to maintaining various physical, electronic and procedural safeguards to protect personal information in our care.

By providing personal information to us, you agree that this Notice will apply to how we handle your personal information, and you consent to us collecting, using and disclosing your personal information as detailed in this Notice. If you do not agree with any part of this Notice, you must not provide your personal information to us. If you do not provide us with your personal information, or if you withdraw a consent that you have given under this Notice, this may affect our ability to provide services to you or negatively impact the services we can provide to you.

What information we collect

In order to provide our services Habitus Health LTD collects, uses, and discloses personal data. Personal data is any information that can be used to identify you or that we can link to you. You, as user of the Services, may be asked to provide certain personal data when you use our Services, for example: your name, telephone number, email address, personal profile data (e.g. height, weight, age range, gender) and other relevant details.

How do we collect personal data

Your personal information is collected directly from you whether it is in person, by telephone, email, through mobile apps, or any other contact we or our business partners may have with you.

How do we use and disclose personal data

Habitus Health LTD collects and uses your personal data for specified, explicit, and legitimate purposes as described in this Privacy Policy and does not process your personal data further in a manner that is incompatible with those purposes. By continuing to use our services and/or by providing us with personal information (or allowing another person to do so on your behalf), you consent to us using and disclosing your personal information for the purpose for which it was collected, and, where permitted by your local data protection laws, for any related secondary purpose which we believe you would reasonably expect.

The purposes for which we collect personal information, and those secondary purposes which we consider to be directly related, include:

- providing you with services and tools you choose to use;
- identification of fraud or error;



- regulatory reporting and compliance;
- developing and improving our products and services and those of our related entities;
- servicing our relationship with you by, among other things, creating and maintaining a customer profile to enable our brands to service you better or presenting options on our website we think may interest you based on your browsing and preferences;
- involving you in market research, gauging customer satisfaction and seeking feedback regarding our relationship with you and/or the service we have provided;
- to facilitate your participation in loyalty programs;
- for research and analysis in relation to our business and services, including but not limited to trends and preferences in health-related products and use of our websites;
- internal accounting and administration;
- to comply with our legal obligations; and
- other purposes as authorised or required by law (e.g. to prevent a threat to life, health or safety, or to enforce our legal rights).

Disclosure of personal information

Personal data collected may be shared with or disclosed to:

- Habitus Health LTD and its related companies, affiliates, subsidiaries, joint ventures, partners, subcontractors, and agents as necessary to fulfil and support the Services, including responding to requests, and assessing or offering promotions.
- Users for reporting, auditing, and other purposes as necessary
- Third party service providers you request we send personal data to.
- Other third parties as we believe is reasonably necessary in accordance with applicable laws, including laws outside your country of residence to: (i) satisfy laws, regulations, or governmental or legal requests and processes; (ii) identify, contact, or bring legal action against someone who may be violating our terms of use or policies or otherwise enforce our terms and policies; (iii) operate the Services properly; or (iv) protect Habitus Health LTD and those it serves, including pursuing available remedies or to limit damages that may be sustained (e.g. exchanging information with other companies and organizations for the purposes of fraud protection and risk reduction).
- Data consolidation companies may also be used by Habitus Health LTD or you for the purpose of creating reports and related statistics for benchmarking or other



related purposes, including, without limitation, utilizing cumulative statistical data, which may incorporate data acquired from you for ordinary business purposes customary in our industry and the Services we provide, but without identifying, you directly or indirectly.

- Habitus Health LTD may be acquired, merge with another business, sell, or liquidate its assets, acquire, or buy other businesses or assets. In such transactions, personal data is generally one of the transferred business assets. In the event of an acquisition, sale, liquidation, or merger, your personal data and non-personal identifying information may be automatically assigned by us in our sole discretion to a third party.

Retention of Data

We retain data that is required in our contractual duties in the provision of services to you. We review the data frequently and only retain for as long as necessary. Any deletion of data that is required, is completed in a timely fashion.

Opt-Out

You may receive updates regarding special promotions or competitions targeted to your specific interests from time to time. You are under no obligation to respond to these emails and once notified we will take steps to stop using your information in this way.

Cookies

A cookie is a small piece of text sent to your computer's memory which can later be retrieved by other web pages. Cookies are used to make your interactions online more convenient for you. You can disable cookies using your own browser settings; however, this may affect what material you will have access to on our websites.

Your Rights

You may request at any time a copy of the personal information held about you and request its correction or deletion. To obtain a copy of this information please forward the required documents by mail post, or email, to our Data Protection Manager (See contact information below).

For this purpose, you must provide the following documents:

- A signed request;
- A copy of your passport or national ID, so that we can verify your identity;
- A signed authority from any third party whose data you request on their behalf.

Upon receipt of your request and within one month of receipt, we will inform you about the type of personal information we hold about you, the purposes for which we hold it and the possible recipients or types of recipients, as well as a copy of such data.



Changes to this Privacy Policy

We may update this Privacy Policy in the future. We will notify you about material changes to this Privacy Policy by sending a notice to the email address you provided to us or by placing a prominent notice on our website.

Complaints/ Feedback

All complaints/feedback can be done via email to info@habitushealth.net

All requests for access to your information or change of your information is done via a written request to:

Data Protection Manager

Breffni Allen

breffni@habitushealth.net