

## HealthTech20x Privacy Policy

Last Updated July 27<sup>th</sup> 2023

This Privacy Policy describes the privacy practices of HealthTech20x Ltd and its affiliates and subsidiaries (collectively, “**HealthTech20x**”, “**we**”, “**us**” or “**our**”) in relation to personal information that we collect through our website, in providing our services, and through our interactions with you in-person or otherwise. It describes how and why we process your personal information (for example, by collecting it, using it, storing it, or sharing it with others), and what rights you can exercise in respect of your personal information. HealthTech20x is the controller with respect to personal information under this Privacy Policy (this simply means we are responsible for your personal information).

### 1. COLLECTION OF YOUR PERSONAL INFORMATION

We collect the following personal information about you:

#### *Information you give us*

- **Contact details** such as your first and last name, organization name (if applicable), address, email and phone number.
- **Communications** that we exchange with you when you contact us or otherwise interact with us, including via the contact us web forms on our website, phone, email, post or social media.
- **Marketing data** such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Other information** that we may collect which is not specifically listed here, but which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

#### *Information we obtain from other sources*

- **Referrals.** We may obtain personal information about you through referrals from third party sources. For example, if you are a representative of a business that may benefit from our services or a partnership with us.
- **Social media information.** We may maintain pages on social media platforms, such as Facebook, Twitter, and LinkedIn. When you visit or interact with our pages on those platforms, you or the platforms may provide us with information through the platform.
- **Other sources.** We may obtain personal information from other third parties, such as marketing partners, publicly-available sources, and data providers.

#### *Automatic data collection*

- **Visiting our website.** We collect personal information about you automatically when you visit and interact with our website. Our servers keep an activity log unique to you that collects certain administrative and traffic information including your device details, device location, source IP address, time of access, date of access, web page(s) visited, language use, software crash reports and type of browser used.
- **Cookies (and similar technologies).** We collect personal information about you by automated means when you visit and use our website through cookies and similar technologies (e.g. web beacons, pixel tags, etc.) placed on your device. Cookies and similar technologies are simple

pieces of computer code which are designed to collect information from the device you use to access our website. The information collected may include a user ID assigned to you, your IP address, the content you have interacted with, duration of each visit and error messages you encounter.

## 2. USE OF YOUR PERSONAL INFORMATION

**Provide our services.** It is in our legitimate business interests to use personal information to operate, maintain, and provide you with our services. For example, to make sure you can use our website and also to provide you with our advisory services.

**Communicate with you about our services.** It is in our legitimate business interests to use personal information to respond to your requests, provide support, and communicate with you about our services, including by sending announcements, updates, security alerts and support and administrative messages.

**Improve, monitor, personalize, and protect our services.** It is in our legitimate business interests to improve and keep our website and services safe for our users, which includes:

- Analysing how you interact with our website and services, improving and developing our website and services, and developing our business and marketing strategy, including through the use of Cookies. Where we place non-essential cookies on your device for this purpose, we rely on your consent to use of your personal information obtained from those non-essential cookies for this purpose. Please see our Cookie Policy to learn more.
- Investigating and protecting against fraud, illegal activity, or misuse of our services, and ensuring the security of our IT systems, architecture and networks (including troubleshooting, testing, system maintenance, support, and hosting of data).

**Research and development.** We may use personal information for research and development purposes in our legitimate business interests, including to analyse and improve our website, services and business. As part of these activities, we may create or use aggregated, de-identified or other anonymized data from personal information we collect.

**Direct marketing.** We may send you direct marketing communications about our services, that we think may be of interest to you as permitted by law, including by email. You may opt-out of our marketing communications by selecting the unsubscribe link in any marketing emails or by contacting us. We will only send you marketing information if it is in our legitimate business interests to send such information. However, where we are required to obtain your consent by law, we will only send you marketing communications if you consent to us doing so.

**Supplier/Partner relationships.** Where you are a supplier/partner or a representative of a supplier/partner, it is in our legitimate business interests to use your personal information to contact you and to manage our relationship with you and/or your company. If we have entered into a contract with you/your company, we will use your personal information as required for us to perform our contractual obligations under the relevant contract.

**Compliance and protection.** We may use personal information to comply with legal obligations, and to defend us against legal claims or disputes, including to:

- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);

- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern our website and services;
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft; and
- comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

### 3. SHARING OF YOUR PERSONAL INFORMATION

We may share your personal information with the following parties:

**Affiliates.** We may share your personal information with members of our group, including our subsidiaries and affiliates, for purposes consistent with this Privacy Policy.

**Service providers.** Companies and individuals that provide services on our behalf or help us operate our website or our business (such as hosting, information technology, support, email delivery and website analytics services).

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

**Business transfers.** Acquirers and other relevant participants in business transactions (or negotiations for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests (including, in connection with a bankruptcy or similar proceedings).

**Your instruction or permission.** A relevant third party, where you give us permission to do so in the course of your relationship with us from time to time.

### 4. RETENTION OF YOUR PERSONAL INFORMATION

We generally retain your personal information only for as long as necessary to fulfil the purposes outlined in this Privacy Policy. This will generally be for the duration of time you interact with us, however, there may be situations where we retain your personal information for a longer or shorter period. When determining the relevant retention periods for your personal Information, we take into account any permissions you give us with regards to your personal information, our contractual obligations and rights in relation to the personal information involved, our legal obligation(s) under relevant laws to retain data for a certain period of time, our legitimate business and commercial interests, whether retention is advisable in light of our legal position (such as with regard to applicable statute of limitations, investigations, litigation, and other potential and actual disputes), and any guidelines issued by relevant data protection authorities.

### 5. INTERNATIONAL TRANSFERS

We are located in and process your personal information in the United Kingdom.

### 6. COOKIES

Cookies are small text files placed onto your device (computer, mobile phone, etc) by certain websites that you visit or e-mails that you open and generally collect standard internet log information and visitor behaviour information. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

We only use strictly necessary cookies on our website. These cookies are necessary for our website to function correctly. They enable you to move around our website and use our website features. Without these cookies, you would not be able to navigate between pages or use certain core features of our websites. As these cookies are necessary for the provision of our website and our services to you, we do not require your consent for their use. You can set your browser to block or alert you about strictly necessary cookies, but if you block these cookies, some parts of the website may not work for you.

Most browsers let you remove or reject cookies through browser settings and instructions. Please see the links below for instructions on how to turn off or delete cookies on popular browsers. If you disable or delete cookies, however, you may have to manually adjust some preferences every time you visit the website and some functionalities may not work.

- [Chrome](#)
- [Firefox](#)
- [Microsoft Edge](#)
- [Safari \(Mac\)](#)
- [Safari \(Mobile/iOS\)](#)

For more information on cookies and how they can be managed and deleted please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 7. YOUR RIGHTS

By law, you have a number of rights (subject to certain conditions and exceptions) when it comes to your personal information and can exercise any of these rights by contacting us.

***You have the right to object to us processing your Personal Information where we rely on “legitimate business interest” (see the “Use Of Your Personal Information” section above) as a lawful basis for processing your Personal Information.***

You also have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”) and receive a copy of it, along with supplemental transparency information similar to what is provided in this Privacy Policy.
- **Request correction** of the personal information that we hold about you if it is incomplete or inaccurate.
- **Request erasure** of your personal information.
- **Request the restriction of processing** of your personal information, for example, if you want us to establish its accuracy or the reason for processing it.

- **Request portability** of your personal information. If required to do so, we will provide you or another party with any personal information we have obtained from you, in a structured, machine readable and reusable format.
- **Withdraw consent** to the processing of your personal information at any time where we rely on your consent as a lawful basis for processing your personal information. This won't affect anything we have used your personal information for before you withdraw your consent.
- **Lodge a complaint** about the way we handle or process your personal information with a data protection regulator. In the UK, this is the Information Commissioners Office (ICO) Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Phone number: 0303 123 1113. Website: <https://ico.org.uk/make-a-complaint/>

## **8. CHANGES TO THIS PRIVACY POLICY**

HealthTech20x may periodically make changes to this Privacy Policy. We will notify you of any significant changes where we have a relationship with you and otherwise post updated versions here. We encourage you to periodically review this Privacy Policy to be informed of how HealthTech20x is protecting your personal information.

## **9. HOW TO CONTACT US**

If you wish to exercise any data subject rights or have any questions about this Privacy Policy or our information practices, please feel free to contact us at [admin@healthtech20x.com](mailto:admin@healthtech20x.com)