



## HALEN PRIVACY AND COOKIES POLICY

This is the Privacy & Cookies Policy (the “Policy”) of Liberate Health Limited t/a Halen, a company incorporated under the laws of England and Wales with company number 12568933 whose registered office is 7-9 The Avenue, Eastbourne, East Sussex, BN21 3YA (hereafter “Halen”, “we” or “us”). This Policy describes the ways in which Halen collects and uses information about you when you use our website at [www.halenstrength.com](http://www.halenstrength.com) (the “Website”), or when you register to use our mobile application, either as a professional (a “Pro”) or as a user wishing to participate in sessions with a Pro (the “Platform”).

Halen may change this Policy at any time and when this happens we will notify you of any changes to this Policy by noting this on the Website or, for material changes and if you have an account with us, we will e-mail you. The changes will apply to your use of the Website and/or the Platform after we have notified you. If you do not wish to accept the new Policy you should stop using the Website and/or the Platform (as applicable). If you continue to use the Website and/or the Platform after the changes, your continued use of the Website and/or your use of the Platform shows us your agreement to be bound by the new Policy.

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

This Policy was last changed in May 2021.

**1. ICO registration:** For the purposes of data protection legislation, Halen is the controller for the processing of your personal data and has registered with the Information Commissioner’s Office (“ICO”).

**2. What Information do we collect about you?** We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (a) Identity Data includes first name, last name, and (if you choose to provide it) gender.
- (b) Contact Data includes billing address, residential address, email address and telephone numbers.
- (c) Financial Data includes bank account and payment card details.

- (d) Transaction Data includes details about payments to and from you and other details of what you have purchased from us.
- (e) Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, and other technology on the devices you use to access our Website and/or Platform.
- (f) Profile Data includes your username and password, purchases made by you, your interests, preferences, feedback and survey responses. Please note that, as a user of the Platform, when you first log-in to the Platform you will be asked to provide us with the reasons why you are seeking to engage with one or more Pros. These responses are chosen by you and also include a notes section. We may therefore collect certain special category data from you at this point, if you choose to provide it to us. The notes section is, however, optional and the other headings do not require you to provide such information to us. We only therefore collect it if you choose to provide it to us accordingly.
- (g) Usage Data includes information about how you use our Website and Platform.
- (h) Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- (i) Session Data includes any technical details related to Sessions, including date and time, duration, participant details, and other related information necessary for technical support, billing, Platform optimisation and improvement, and any other data which arises before, during or after a Session that is not covered elsewhere. Any information disclosed by you during a Session, together with any notes taken during the course of a Session by Pros are not collected, stored, managed, or maintained on the Platform and Halen has no access to and does not use such data.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website and/or Platform feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

Due to the nature of the services which the Pros provide, Pros may collect special categories of personal data about you. We expect that this may include details which relate to your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions and information about your health. Where this is disclosed as part of a Session the Pro will

only record this information as it relates to the Session and services it is providing to you. This information will only be retained in notes made during a Session between yourself and your Pro and this information will not be shared with any external or internal party unless we are required to do so under the law; such as to protect your life or the life of another person.

**3. Information we use about you:** We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer and enable you to create your account or, in the case of a Pro, register you as a Pro	(a) Identity (b) Contact	Performance of a contract with you i.e., to enable you to access and use our services via the Platform
To, as a customer, match you with a Pro	(a) Identity (b) Profile	(a) Performance of a contract with you i.e., to enable you to access and use our services via the Platform (b) In the case of any special category data provided by you as described in the Profile Data section above, your explicit consent as it is your choice as to whether to complete the notes section, what information to include within it, and/or provide such data to us
To collect fees including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you i.e., to enable you to access and use our services via our Platform (b) Necessary for our legitimate interests (to recover debts due to us)
To enable you to access and use our services via our Platform	(a) Identity (b) Contact (c) Session	Performance of a contract with you i.e., to enable you to access and use our services via our Platform
To manage our relationship with you which will include:	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you i.e., to enable you to access and use our services via our Platform

<p>(a) Notifying you about changes to our terms and conditions or this Policy  (b) Asking you to leave a review or take a survey</p>	<p>(d) Marketing and Communications</p>	<p>(b) Necessary to comply with a legal obligation e.g., we may need to update the terms and conditions or this Policy to take into account new legislation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers and Pros use our Platform)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you i.e., to enable you to access and use our services via our Platform  (b) Necessary for our legitimate interests (to study how customers and Pros use our Platform, to develop our Platform and grow our business)</p>
<p>To administer and protect our business and our Platform and Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity  (b) Contact  (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant content and marketing information to you and measure or understand the effectiveness of such communications that we do send to you</p>	<p>(a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications  (f) Technical</p>	<p>(a) Necessary for our legitimate interests (to study how customers and Pros use our Platform, to develop them, to grow our business and to inform our marketing strategy)  (b) Consent (where we are not able to rely on legitimate interests by law)</p>
<p>To use data analytics to improve our Platform and Website, marketing, customer relationships and experiences</p>	<p>(a) Technical  (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our Platform, to keep our Website and Platform updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about services that may be of interest to you</p>	<p>(a) Identity  (b) Contact  (c) Technical  (d) Usage  (e) Profile  (f) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to develop our products/services and grow our business)  (b) Consent (where we are not able to rely on legitimate interests by law)</p>

**4. Marketing:** Please note that in relation to marketing communications, we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or created an account to access and use our Platform and you have not opted out of receiving that marketing. We will not, however, carry out any marketing of third party products/services and/or share your data with third parties for marketing purposes without first obtaining your express opt-in consent to do so.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions

**5. Sharing your information with third parties:** Some of the information Halen collects from you is passed to third parties. These third parties are:

- (a) Service providers acting as processors based within the United Kingdom such as AWS who provide IT and system administration services.
- (b) Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- (c) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- (d) Customer relationship management and marketing automation apps, acting as a processor, such as Hubspot, Inc based in the US who provide CRM and email marketing automation services.
- (e) Merchant services, acting as a processor, such as Stripe, Inc based in the US, who provide secure payment processing services.
- (f) Cloud communications apps, such as Twilio, Inc based in the US, who provide services relating to our Website and Platform.
- (g) Certain third party analytics and cookies providers as described further in Clause 9 below.
- (h) Our regulator (the ICO).
- (i) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses

or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Policy.

**6. Links to third party websites:** Halen is not responsible for the privacy policies and practices of other sites, plug-ins and applications even if you access them via the Website and/or our Platform. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. You should check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

**7. Security:** Halen has implemented technology and policies to safeguard your privacy from unauthorised access and improper use.

**8. Storage and Data Retention:** We store your personal data in the EEA. Certain third parties which we engage (as described in Clause 5 above) may, however, transfer data outside the EEA and we have entered into agreements with such third parties ensuring that they have an appropriate adequacy basis on which to do so. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In regards to Session Data this will be kept for the duration of any contract which we have in place with you and for a reasonable period after your final session in case there are any further sessions. In regards to any Session Data which is created and processed, such as notes of a Session, Pros will retain and delete this information in accordance with the best practices and professional standards of their specialty. In some circumstances you can ask us to delete your data, see your legal rights below for further information. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

**9. Cookies/Third Party Technologies:** Cookies are small text files that are placed on your device when you use the Website. Halen's use of cookies and similar technologies is detailed

below. Halen uses cookies and similar technologies in the following ways when you use the Website:

<b>Cookie/Tech- nology Type</b>	<b>Purpose</b>	<b>Further Information</b>
Google Tag Manager	Halen uses Google Tag Manager to collect information about how visitors use the Website, which Halen uses to help improve its services.	<a href="https://www.google.com/analytics/terms/tag-manager/">https://www.google.com/analytics/terms/tag-manager/</a>
Facebook Marketing Tools	When you click on any advert on Facebook that redirects you to Halen's Website, Facebook will deploy a pixel to identify that you have done so which allows us to measure the effectiveness of such adverts for statistical and marketing purposes. Whilst this data is anonymous to us, this data is stored and processed by Facebook. We do not control what Facebook then does with such data.	<a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>

**10. Exercising your rights:** You can contact us using the details set out in Clause 11 below if you wish to: (i) access a copy of the personal data that we hold about you; (ii) correct any items of personal data that we hold about you; and/or (iii) have any items of personal data that we hold about you erased or object to our processing of such items of personal data.

**11. Halen Details:** If at any time you would like to contact Halen about your views on this Policy or any enquiry relating to your personal information, you can do so by sending an e-mail to us at [info@halenstrength.com](mailto:info@halenstrength.com) or write to us at our registered office. You also have the right to make a complaint to the ICO by contacting them (<https://ico.org.uk/global/contact-us/>) at any time.