

Privacy Policy

This notice describes Health Circuit SL (“HC”, “we” or “us”) privacy policy (the “Privacy Policy”) and shall apply to any personal data that we collect from you, or that you provide to us, when you use the services offered by HC and/or the Health Circuit Application for mobile telephones and handheld devices (the “APP”), including all online and wireless services and functions provided thereon (together “the Services”). This privacy policy sets out the basis on which such personal data will be processed by us.

PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY BEFORE USING Health Circuit, THE APP AND/OR THE SERVICES. IF YOU DO NOT AGREE WITH OUR PRIVACY POLICY, PLEASE DO NOT USE Health Circuit, THE APP OR THE SERVICES. BY USING Health Circuit, THE APP OR THE SERVICES, OR BY SUBMITTING ANY PERSONAL INFORMATION OR CONTENT, YOU AGREE TO BE BOUND BY THE TERMS OF THIS PRIVACY POLICY.

Information we may collect from you

We may collect and process the following data about you:

- Information you give us (Submitted information): You may give us information about you by the secure remote communication, including follow-up questionnaires, when you use the APP and/or use the Services or by corresponding with us (for example, by e-mail or text message). The information you give us may include your username and other registration information.
- Information we collect about you and your device. Each time you use the App we may automatically collect the following information: details of your use of the App and other similar data (Log Information).
- Unique application numbers: When you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

Uses made of the information

We use information held about you in the following ways:

- Information you give to us. We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and Services that you request from us;
 - to notify you about changes to our Services;
 - to ensure that content from the App is presented in the most effective manner for you and for your computer or Device.

Information we collect about you

We will use this information:

- to maintain, administer and monitor the Services in order to analyze trends, improve the overall quality of the Services, tailor the Services to your needs and respond to your inquiries. Such analysis and information is aggregated across users, does not identify you as an individual and does not link to any personally identifiable information;
- to administer the App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

- to improve the App to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep the Services safe and secure;

Disclosure of your information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006. We may share your information with selected third parties including business partners, suppliers and sub-contractors who provide Services on our behalf. We may also disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your user data to the prospective seller or buyer of such business or assets;
- if HC or substantially all of its assets are acquired by a third party, in which case user data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your user data in order to comply with any legal or regulatory obligation or request; or
- in order to:
 - enforce or apply the App Terms and Conditions and other agreements or to investigate potential breaches; or
 - protect the rights, property or safety of HC, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Data Retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Protection of Minors

HC does not permit anyone under the age of 16 to register to use the App or Services or use any of its functionality for which registration is required. If you are under 16 please do not register to use the Website, App or Services. If you do register and we find out that you are under 16 your account will be deleted. If you are between the age of 16 and 18 your registration must be with the permission of your parent or guardian. If you do not have such permission, please do not register. If the event that we find out that you are between the age of 16 to 18 and you do not have such permission your account will be deleted. The above relates to direct registration with HC.

NOTE TO PARENTS AND GUARDIANS. If you become aware that your child has provided us with personal information without your consent, please contact us at info@healthcircuit.es. HC do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take all reasonable steps to remove such information and terminate the child's account.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, our secure servers located at a destination inside the European Economic Area (EEA): FRA1: Frankfurt, Germany. It may also be processed by staff operating inside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of the APP or certain Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Security

Health Circuit is committed to protecting your information. To do so, we employ a variety of security technologies and measures designed to protect information from unauthorized access, use, or disclosure. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

However, please bear in mind that 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 your data transmitted to or via the APP; 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 unauthorized access.

Your Rights under applicable data protection laws

Your rights under the applicable data protection law as at 1 June 2018 are as follows:

- The right to be informed about the processing of your personal data;
- The right to have your personal data corrected or completed if it is inaccurate or incomplete;
- The Right to object to the processing of your personal data;
- The Right to restrict the processing of your personal data;
- The Right to have your personal data erased;
- The right to request access to your personal data and information about how it is processed;
- The Right to move, copy and or transfer your personal data;
- The Right to object to automated decision making including profiling.

We will seek to deal with any request or complaint with regard to Our dealings with your personal data within 28 days of formal notification from you.

You have the right at any time to complain to the Information Commissioners Office.

Changes to our Privacy Policy

HC may update this Privacy Policy from time to time as HC's business and services expand and change. Updates to this policy will be posted on this page. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services. HC encourages you to review this policy periodically to review any changes that have been posted. HC will never change its commitment to your privacy.

Questions

If you have any questions, comments or feedback about HC's use of your personal information or about this Privacy Policy, please contact us at info@healthcircuit.es and we will use reasonable efforts to promptly investigate any complaint you may have regarding our use of your personal data and to comply fully with the legal and regulatory supervisory authorities responsible for enforcing HC's adherence to the privacy principles stated above.