

Welcome to Latus Health Limited's privacy policy for Yodha. Yodha comprises of a web app (the "web app") and a mobile app (the "mobile app"). This policy contains information on what personal data we collect, why and how we use it, and the steps we take to protect your privacy and the security of your personal data.

This privacy policy explains how we collect, use, share, transfer, store, and protect your personal data when you visit our website (regardless of where you visit it from). It also explains how to contact us to find out what personal data of yours we hold; what we use it for; how you can correct any inaccuracies; and how you can request that we stop using it. Please read this privacy policy carefully since once you use this website you will be regarded as having read and accepted its terms.

ABOUT US

<https://yodha.io> (the "website") is owned by Latus Health Limited.

Our registered address is:

Suite 1, The Riverside Building, Livingstone Road, Hessle, HU13 0DZ

Our company number is: 10559793.

Latus Health Limited is the data controller and responsible for your personal data.

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy or our privacy practices, please contact our Data Protection Officer at the address stated above or at usersupport@yodha.io

PURPOSE OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING

Latus Health Ltd will only use your personal data where the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal obligation.

If you sign up on our website or one of our landing pages, then personal data is processed on the basis of performing a contract with you. For marketing communications, if you are an existing member we have a legitimate interest to provide marketing communications to you to develop our products/services and grow our business. However, you will always have the option of unsubscribing from these emails. If you are a new customer, you will be required to provide consent by checking an 'opt in' box. If you do, you will always have the option to unsubscribe to marketing. If you do not opt in, you will only receive transactional emails and emails that you are required to be made aware of (e.g. updates to terms, privacy policy etc). In other cases (for example, receiving employee benefits) we will be processing your personal data using the lawful basis of fulfilling a contract with the third party benefit provider or the employer.

LEGITIMATE INTERESTS OF LATUS HEALTH LTD OR THIRD PARTIES

Latus Health Ltd have a legitimate interest in processing the personal data which is provided by customers at the point of sale for marketing purposes.

We may also use your personal data for other specific legitimate purposes such as:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have either explicitly consented to.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

We may also use your data, or permit selected third parties, such as but not limited to; participating retailers, Physitrack (for physio programs and monitoring), Health Hero (for our online GP services and counselling), your referring organisation (where applicable) or Simfoni (our voucher partners) to use your data to provide you with services and information about goods which may be of interest to you and we may contact you about these by post or telephone. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

We do not sell, rent or lease customer lists to third parties. We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, we may share data with trusted partners to help us perform affiliate marketing, statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal data except to provide these services to us, and they are required to maintain the confidentiality of your personal data.

If you are an existing customer, we will only contact you by electronic means (e-mail, SMS, Push, Phone) or post with information about goods and services similar to those which were the subject of your original consent if you have consented to receive such marketing or you have entered into a contract with us or purchased from us and have not opted out of receiving marketing.

If you are a new customer, and where we permit selected third parties, such as participating participating retailers, or Simfoni, to use your personal data, we (or they) will contact you by electronic means only if you have consented to this.

DATA WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site <https://yodha.io>
- **Information passed to use by your referring organisation**

- User name and password – If we collect a user name and password, this is so we can keep your personal data secure and so that we can have your information to hand each time you visit us.
- Name, address and postcode – Without this we won't know where to send your order or to whom, we also use postcodes to quickly get your full address to save you typing it out and in some cases to identify whether we deliver or offer services in your area. If you have location services enabled on your smart device we may also use this to recommend restaurants / applicable services in within the area you are in.
- Email address – We send confirmation of your orders via email and will send you informational messages as well as offers which may interest you.
- Telephone numbers – If there are any problems with your order or we need to check anything, we need to be able to contact you quickly.
- GP details – if you choose to engage with our online GP services we will ask about your GP details should you need a prescription or further referral.
- Existing health conditions (web app only) – we will ask about any previous or existing medical conditions that may affect your line of work.
- Medical information (web app only) – if your organisations requires you to attend health surveillance app
- Date of Birth – We may request this to verify your age.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our site and the resources that you access.
- App usage data – including location services.

Where we need to collect personal data by law, or under the terms of a contract with you, and you fail to provide the data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example to provide you with products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case.

We do collect some Special Categories of personal data about you (this includes details about your race, ethnicity, and information about your health, genetic and biometric data)

We do not collect the following Special Categories:

- Religious or philosophical beliefs
- Sex life
- Sexual orientation
- Political opinions
- Trade union membership
- Criminal convictions and offences

DATA WE MAY SHARE

Latus Health Ltd are required to share the personal data provided by its customers to third parties in order to fulfil contractual obligations. The following are categories of recipients that customer information could be shared with:

- Data Centres – This is so we can store your data securely
- Fulfilment Houses – To allow us to fulfil and send you a physical card if you have ordered one.
- External IT Providers – To provide disaster recovery and back up services
- Payment Providers – To process your payment securely
- Referring Organisation – To allow you to access the benefits
- Business Benefit Providers – To allow you to access the benefits

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes in accordance with our instructions.

All information you provide to us is stored on our secure servers. Any payment transactions are encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information and personal data 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 our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access. We may disclose your personal data to any member of our group (Latus Health Ltd), which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. We will not disclose your personal data to any of the relevant third parties listed above in this section for marketing purposes. Our Data Protection Officer can provide you with contact details of our third parties upon request if required. You are able to do this by emailing our Data Protection Officer at usersupport@yodha.io

RETENTION PERIOD

Latus Health Ltd retain all customer personal data for 5 years after they last interacted with us. Where there has been a period of 5 years after the end of membership and where there has been no interaction between the organisation and the customer within this time, their personal data is erased and securely disposed of. 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 of our relationship with you.

In some circumstances we will anonymise your personal data (so it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without notice to you.

RIGHTS OF DATA SUBJECTS

Latus Health Ltd process personal data on your behalf which means you are a Data Subject (individual), so you have the right to withdraw consent from our marketing at any

given time. You can exercise the right at any time by contacting us at usersupport@yodha.io However, we will still be required to notify you of changes to our privacy policy, terms and conditions and any other legal requirement.

You have the right to make a Subject Access Request to Latus Health Ltd's Data Protection Officer in the event that you wish to determine what personal data we hold about you. We welcome these requests and aim to respond within 72 working hours of receipt. Occasionally it could take us longer than 72 hours 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.

You will not have to pay a fee to access your personal data (or to exercise any 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.

You have the right to request your data to be erased. This can be done by contacting usersupport@yodha.io. Please bear in mind this is not an absolute right and there may be instances where we cannot completely erase your data (e.g. when the personal data is required for the exercise of legal claims or to comply with any legal obligation placed upon us), if an exception does come up this will be discussed with you when you make the request.

You have the right to rectification. If you notice that any of your details are incorrect please contact the customer service team who will be more than happy to rectify this. We will also send transactional reminders to request that you notify us of any changes to your personal data so that we can keep your data up to date.

You have the right to portability. This is where you would like to transfer your data to another organisation. To request this, please contact usersupport@yodha.io. We will provide this within a structured CSV file for you to provide to a third party.

You also have a right to lodge a complaint with the Supervisory Authority (Information Commissioners Office in the UK), should you feel that we have not handled your personal data in line with legislative and regulatory requirements (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of the other rights). This is a security measure to ensure that personal data is not disclosed to any person who has

no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

AUTOMATED DECISION MAKING, INCLUDING PROFILING & INFORMATION ABOUT HOW DECISIONS ARE MADE

We use location services through both our applications and websites in order for us to tailor our marketing material to your specific behaviour and activities, e.g. the types of retailers which you regularly visit. We use email monitoring services to monitor the emails which we send to users. In doing this, we obtain information such as but not limited to:

- Time of receipt
- Time of opening
- Device user to open
- Savings made
- Which parts of the email you interacted with

We use systems that enable us to link your social media accounts to your account if registered with the same email address. This enables us to tailor our promotions and products as best as possible.

Where you have provided us with a mobile number, we may market to you using SMS and Push notification interactions. You can unsubscribe at any time by texting STOP.

Our systems are set up to enable us to collect information on your spending history inclusive of savings made when using our service, we link this data to your profile so that we can determine what other deals or informational emails may be of interest to you. As above we will only do this if you opt-in to receive marketing communications or you have entered into a contract with us or purchased from us but have not opted out.

INTERNATIONAL TRANSFERS

We do not transfer your personal data outside of the European Economic Area.

IP ADDRESSES

We may collect information about your computer, including where available your IP address, geographic location (if you allow when prompted by your browser), operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns. If we combine this data with your personal data so that it can directly or indirectly identify you, we will treat such statistical data as personal data which will be used in line with this privacy policy.

COOKIES

To enable our systems to recognise your device and to provide features to you, we use cookies. For more information about cookies and how we use them, please read our Cookie Policy.

MARKETING COMMUNICATIONS

We regularly send out email communication to keep you up to date with all the latest discounts and offers from the Latus Health Ltd brands and our chosen partners. If you

wish to unsubscribe from these emails you can do so at any time by simply clicking either of the links in the header or footer and you will be removed from all promotional emails. Please note that even if you decide not to subscribe to, or to unsubscribe, from promotional email messages, we may still need to contact you with important transactional information related to your account and your purchases. For example, even if you have unsubscribed from our promotional email messages, we will still send you confirmations when you make purchases on the Site or provide updates to the privacy policy.

CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time. If we make significant changes in the way we treat your personal data, or to the Privacy Policy, we will make that clear on our websites or by email, so that you are able to review the changes. In the event that you wish to alter your Privacy settings or opt-out, you are able to do this by emailing our Data Protection Officer at usersupport@yodha.io

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should either be emailed to usersupport@yodha.io or addressed to Latus Health Limited, Gibson Lane Melton Industrial Estate, North Ferriby HU14 3HH