

Circle HealthPod App Privacy Policy

Updated on 12 August 2021

Your privacy is important to us. It is our policy to respect your privacy regarding any Personal Information we may collect from you when you use the Circle HealthPod App (the “**App**”).

This Privacy Policy (the “**Policy**”), together with our Terms of Service and End User License Agreement and any additional terms of use incorporated by references into the End User License Agreement (together the “**Terms of Use**”) applies to your use of the App and any of the services accessible through the App.

This Policy sets out the basis on which any Personal Information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your Personal Information and how we will treat it.

1. Important Information and Who We Are

Prenetics Limited (“**Prenetics**”, “**we**”, “**us**”, or “**our**”) is the data user and is responsible for your personal information. If you have questions about this Policy, please contact Customer Care by email at customercare@prenetics.com or by post to Prenetics Limited, 7/F, Prosperity Millennia Plaza, 663 King's Road, North Point, Hong Kong (Attn: Circle HealthPod Customer Care).

“**Personal Information**” includes any information directly or indirectly relating to you, from which it is practicable for your identity to be directly or indirectly ascertained, and which is in a form in which access to or processing of the information is practicable.

Changes to the Policy and your duty to inform us of changes

We keep our Policy under regular review. This version was last updated on 3 June 2021. It may change and if it does, these changes will be updated on this page, and where appropriate, notified to you. If you disagree with any of the changes, please discontinue your use of the App. By continuing to use the App after any changes to the Policy you acknowledge and agree to the changes.

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

2. Information We May Collect

We may collect, use, store and transfer different kinds of Personal Information about you or others as follows:

- a) **Registration Information.** When you create an account and register your Circle HealthPod, we collect information that can be used to identify you, such as your name, date of birth, billing and shipping address, payment information and contact information.
- b) **Profile Information.** When you create a profile for yourself and/or for others on the App, we collect and store the information provided. Before you disclose any information about another person, you must make sure you have permission from the person or the right to do so.
- c) **Referral information.** When you refer a person via the App, we will ask for that person's email address and/or contact number. We will use their email address and/or contact number solely, as applicable, to make a referral to them, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for us to communicate with him or her. The person you referred may contact us to request that we remove this information from our database.
- d) **Customer service.** When you contact Customer Care or correspond with us about our service, we collect information to track and respond to your inquiry, investigate any breach of our Terms of Service, Privacy Policy or applicable laws or regulations, and analyze and improve our services.
- e) **Circle HealthPod Test results.** Your test results may be delivered to your mobile smartphone device and saved on the App via Circle HealthPod's Bluetooth function. Any test results that are sent to your mobile smartphone device are stored in your device's storage and on our cloud servers.
- f) **Usage information.** We may collect information about your usage of the App.
- g) **Aggregated data.** We collect, use and share aggregated data, such as statistical or demographic data for any purposes. Aggregated data could be derived from your Personal Information 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 App feature. However, if we combine or connect aggregated data with your Personal Information so that it can directly or indirectly identify you, we will treat the combined data as Personal Information which will be used in accordance with this Policy.

- h) **Other information.** We continuously work to enhance our services with new products, applications and features that may result in the collection of new and different types of information. We will update this Policy and/or obtain your prior consent to new processing, as needed.

3. How we use your information

We will use your Personal Information in the following ways:

- a) to install the App and register you as a new App user;
- b) to provide you with services, including connecting the Circle HealthPod, registering Circle HealthPod capsules, providing guidance for tests, and storing test results;
- c) to enable and enhance your use of the App;
- d) to manage our relationship with you, including notifying you of changes to the App or any services;
- e) to administer and protect our business and this App, including troubleshooting, data analysis and system testing;
- f) to provide customer support and to contact you about your account and any relevant information about our services (e.g. policy changes, security updates or issues, etc.);
- g) to enforce our Terms of Service and other agreements;
- h) to monitor, detect, investigate and prevent prohibited or illegal behaviour on our services, to combat spam and other security risks;
- i) to provide you with marketing communications; and
- j) to perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

4. Information we share with third parties

We may share your Personal Information with the third parties set out below:

- a) General service providers may receive your Personal Information for:
 - i) order fulfillment and shipping. When you purchase a Circle HealthPod Test or consumable kit from the circlepod.co online store, our payment processor processes

certain Personal Information, such as your billing address and credit card information, as necessary to enable you to make a purchase online. Our logistic services providers ship your kit(s) to you.

- ii) cloud storage, IT, and security. Our cloud storage and other services providers provide secure storage for information in databases, ensure that our infrastructure can support continued use of our services by customers, and protect data in the event of a natural disaster or other disruption to the service. Our IT and security providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically audit our security controls.

Our service providers act on our behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

- b) Commonly owned entities. We may share some or all of your Personal Information with other companies under common ownership or control of us, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Policy.
- c) Pursuant to your request. We give you the ability to share test results through the App. You have the option to share directly with individuals with Circle HealthPod accounts through (i) our platform, or (ii) other sharing features and tools. You may also have the ability to share information directly with individuals who have not participated in our services through social media platforms.
- d) **As required by law.** Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. We will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that we may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce our Terms of Service and other policies; (c)

respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of us, its employees, its users, its clients, and the public.

- e) **Business transactions.** In the event that we go through a business transaction such as a restructuring, merger, acquisition by another company, or sale of all or a portion of its assets your Personal Information will likely be among the assets transferred. In such a case, your Personal Information would remain subject to the terms of this Policy, unless otherwise communicated to you.

5. Your Choices in the Use of Your Personal Information

a) Access, Correction, Updating of Personal Information

You may access and download certain Personal Information in your account settings. If you lose access to your account, or are unable to access certain Personal Information, please contact our customer service representatives as set out below for assistance.

If you lose access to your account, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, we may not be able to sufficiently verify your identity in order to complete your request.

You may access, correct or update most of your Personal Information on your own within your account settings. If you are unable to do so, please contact our customer service representatives at customercare@circlepod.co.

b) Marketing Communications

You may be asked to opt out of receiving product and promotional emails or notifications when creating your account. You can also click the "unsubscribe" button at the bottom of promotional email communications.

c) Sharing Outside Of Our Services

You may decide to share your Personal Information with friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our services, including through third party services such as social networks and third party apps that connect to our App through our application programming interface ("**API**"). These third parties may use your Personal Information differently than we do under this Policy. Please make such choices carefully and review the privacy policies of the other third parties involved. We do not endorse or sponsor any other applications or Sites, and do not affirm the security of any other application or Sites..

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. We will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information with others.

d) Account deletion

You may choose to delete your account at any time. We only retain collected information for as long as 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 Information 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.

6. Security measures

- a) We implement physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information.
- b) We produce secure applications by design. We incorporate explicit security reviews in the software development lifecycle, quality assurance testing and operational deployment.
- c) We limit access to Personal Information to authorized personnel, based on job function and role.
- d) We use state of the art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning in our processes and regularly engage third party security experts to conduct penetration tests.
- e) We maintain a formal incident management program designed to ensure the secure, continuous delivery of its services. We have implemented an incident management program using industry best practices.
- f) We require service providers to implement and maintain accepted industry standard administrative, physical and technical safeguards to protect Personal Information.

Your Responsibility. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our services. You should not disclose your authentication information to any third party and should immediately notify us of any unauthorized use of your password. We cannot secure Personal Information that you release on your own or that you request us to release.

7. Children's privacy

We are committed to protecting the privacy of children as well as adults. Neither we nor any of our services are designed for, or directed towards, children. A parent or guardian, however, may create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to us about his or her child is kept secure and that the information submitted is accurate.

8. Third Party Links

The App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any Personal Information that may be collected through these websites or services. Please check these policies before you submit any Personal Information to these websites or use these services.

9. For Android Only - Location Permission

If you are using Android, we may request for location permissions to be enabled in order to perform a Bluetooth Low Energy scan, which is required to connect the Circle HealthPod Device with your phone. We do not collect or share your location information.

10. Contact Information

If you have questions about this Privacy Policy, or wish to submit a complaint, please email Customer Care at customer care@circlepod.co, or send a letter to:

Prenetics Limited 7/F, Prosperity Millennia Plaza, 663 King's Road, Quarry Bay Hong Kong (Attn: Circle HealthPod Customer Care)