

Privacy Policy

Updated on 2 June 2021

Prenetics respects your privacy and is committed to protecting any personal information we may collect from you when you visit our website, <https://circlepod.co> (the “Site”).

This Privacy Policy (“Policy”) will inform you as to how we collect, use, store, process and transfer you Personal Information when you use the Site. “Personal Information” includes information about you that is personally identifiable, such as contact information (e.g. name, telephone, address, email address) and any other non-public information that is associated with such information.

By using this Site, you acknowledge and agree to the Policy. If you do not agree with any aspect of this Policy, you should immediately discontinue use of the Site.

1. Information we collect about you

We collect two types of Personal Information: (1) information you provide directly to us; and (2) information that we collect through your use of the Site.

(1) Information you provide directly to us

You may give us Personal Information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Information you provide when you:

- a) Apply for our products or services;
- b) Create an account on our Site;
- c) Request marketing to be sent to you;
- d) Enter a competition, promotion or survey; or
- e) Give us feedback or contact us.

(2) Information that we collect through your use of the Site

As you interact with our Site, you provide us with certain web-behaviour information about your equipment, browsing actions and patterns. We collect this information by using cookies and other similar technologies. We may also receive information about you from various third party service providers who use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers).

If you reject cookies, you may still use our Site, but your ability to use some features or areas of our Site may be limited.

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 Information but is anonymised and will not directly or indirectly reveal your identity.

We may use Google Analytics to perform the tasks listed above. We use the User-ID feature of Google Analytics to combine behavioural information across devices and sessions (including authenticated and unauthenticated sessions). We have enabled the following Google Analytics Advertising features: Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and DoubleClick Campaign Manager integration. We do not merge information collected through any Google advertising product with individual-level information collected elsewhere by our service. To opt out of Google Analytics Advertising Features please use Google Ad Settings.

2. How we use your Personal Information

We use your Personal Information in the following ways:

- (1) to provide you with services and to optimise our Site, including:
 - (a) helping us recognize you when you use our Site;
 - (b) enabling and enhancing your use of and experience on our Site;
 - (c) monitoring, detecting, investigating and preventing prohibited or illegal behaviour on our Site, including combating spam and other security risks;
 - (d) analysing usage of our Site;
 - (e) gathering demographic information about our user base;
 - (f) monitoring the success of marketing campaigns; and
 - (g) serving targeting advertising on our Site and on other sites around the Internet.
- (2) to provide customer support.

When you contact us, we may use or request Personal Information as necessary to answer your questions, resolve issues, and/or investigate and troubleshoot problems or complaints.

3. Information we share with third parties

- (1) We may share Personal Information with the general service providers below and for the specific purposes described below:

- (a) Cloud storage, IT, and Security. Our cloud storage and other services providers provide secure storage for information in our databases, ensure that our infrastructure can support continued use of our services by our 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.
- (b) Marketing and analytics. When you use our services, we and our third party service providers may collect web-behaviour information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our marketing campaigns.

NOTE: 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.

(2) Information we share with 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.

(3) 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.

(4) Business transactions

In the event that we go through a business transition such as a restructuring, merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. In such a case, your Personal Information would remain subject to the terms and conditions in this Privacy Policy.

4. How is your information protected?

- (1) 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.
- (2) We produce secure applications by design. We incorporate explicit security reviews in the development lifecycle, quality assurance testing and operational deployment.
- (3) 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.
- (4) We maintain a formal incident management program designed to ensure the secure, continuous delivery of our service. We have implemented an incident management program using industry best practices.
- (5) 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 any passwords, 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.

5. How Long Will We Keep Your Information?

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. Linked websites

Prenetics may provide links to third party websites operated by organizations not affiliated with Prenetics. We do not disclose your information to organizations operating such linked third-party websites. We do not review or endorse, and are not responsible for the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Policy applies solely to information collected by us and our service providers on our behalf.

7. Changes to this Privacy Statement

Prenetics regularly reviews its Privacy Policy and will post any revised version of the Privacy Policy on this Site.

8. Contact Information

If you have any questions, concerns, or complaints regarding our Privacy Policy or a request for access, correction, or deletion of Personal Information, please email Customer Care at customercare@circlepod.co or contact us by post at the following address: 7/F, Prosperity Millennia Plaza, 663 King's Road, Quarry Bay, Hong Kong, Attn: Circle HealthPod Customer Care.