

Lynch Health Enterprises LTD Privacy Policy

Last Updated: January 31, 2025

At Lynch Health Enterprises LTD, we respect your privacy and are committed to maintaining your trust. This privacy policy ("Privacy Policy") applies to visitors of our sites and users of Lynch Health Enterprises LTD Services. This Privacy Policy describes our practices and your rights in connection with information that we collect, use, or disclose through:

- our in-development consumer-facing mobile application ("The Wellbeing Doctors®" / "helfy®" Application),
- our consumer-facing websites and applications ("www.thewellbeingdoctors.com", www.behelfy.com, www.app.behelfy.com, www.app.thewellbeingdoctors.com, www.clinic.thewellbeingdoctors.com, "www.helfyapp.com") ,
- our online business management software products ("Software Service"),
- our social media pages,
- HTML-formatted email messages that we send to you that link to this The Wellbeing Doctors / helfy,
- and any other products and services offered through any other venues, websites and mobile applications that direct you to this The Wellbeing Doctors / helfy.

Collectively the "Lynch Health Enterprises LTD" Services.

"

When you access or use the The Wellbeing Doctors Services, you agree to the terms and conditions of this policy and that the information contained in this policy serves as notice at or before the point of collection for all information collected as described below.

1. Defined Terms

The following terms will have the meanings indicated below. Please refer to [The Wellbeing Doctors Consumer Agreement](#) for any terms that are not defined in this Privacy Policy.

"Client" means any individual who interacts with The Wellbeing Doctors Services, including users of our mobile applications such as The Wellbeing Doctors Website, and individuals who consume content, purchase goods and services and otherwise interact with ourselves or our Partners through The Wellbeing Doctors Services.

"Other Information" is any information that does not reveal your specific identity or does not relate to an individual, such as usage data not linked to any unique identifiers.

"Personal Information" means data that relates to or about an identified or identifiable natural person or, where applicable, household as defined under relevant law. This may include information such as name, postal address, telephone number, email address, or unique online identifiers.

"Partner" is any business or entity that subscribes to (or otherwise accesses or uses) our Software Service, including any staff, employees, consultants, advisors, or independent contractors accessing The Wellbeing Doctors Services on the Partner's behalf.

Sometimes, we use the term "information" in this Privacy Policy, which may refer to either Personal Information or Other Information.

The Digital Health Assessment, including physical examinations and consultation process is a peer-reviewed medically backed lifestyle medicine process that enables the Client and The Wellbeing Doctors to observe their overall wellbeing information.

2. Categories of Personal Information

While the Personal Information we collect varies depending upon the nature of The Wellbeing Doctors Services provided or used and our interactions with individuals, Personal Information we may collect or obtain includes:

- Contact details (e.g., name, address, email, telephone number, which may include third party emergency contact information),
- Personal details (e.g., date of birth, education, nationality),
- Other The Wellbeing Doctors Services related data (e.g., customer requests, statistics, etc.),
- **Health details** (e.g. Blood pressure readings, health scores, health requests from clients - if this health information must be shared outside of The Wellbeing Doctors, other than for legal reasons defined within the laws of England and Wales, it will **always be anonymised**, unless you specifically state you wish otherwise).

3. How We Collect Information

- Through The Wellbeing Doctors Services.
- We collect information about you whenever you use The Wellbeing Doctors Services, for example:
 - If you are a client, when you complete a digital health assessment, we may ask for Personal Information such as your name, email and postal address, social media account ID, and Other Information you may provide with your assessment.
 - If you are a Partner, when you sign up for our Services, we ask for your company name, address, phone number, email, credit card information, tax identification number, and other information about your business, as well as names and email addresses of authorised individuals on your account. If you attend one of our events (e.g. a tradeshow, webinar, or training), we may ask for your feedback, contact details or other information to follow-up with you, such as send you marketing communications consistent with your choices.
 - We collect information about you when you interact with The Wellbeing Doctors Services. For example, if you initiate a transaction through The Wellbeing Doctors Services, such as a purchase, we may collect information about you, such as your name, email, phone number, address, credit card information, as well as any other information you provide in order to process the transaction. We encrypt credit card numbers using industry standard technology. We may also collect other Personal Information at the request of the Partner you are transacting with or through. We may also store information that your computer or mobile device provides to us in connection with your use of The Wellbeing Doctors Services, such as IP address, operating system, device ID, and device type.
 - We may collect information about others from you, including your emergency contacts, and only use this information for the reason it was provided.
 - We and our service providers collect information about your location when you use or access The Wellbeing Doctors Services. The degree of precision of the location data varies depending on the source of such information. Those sources include:
 - Data from your device through settings you activate:
 - Other location sources:
 - IP address
- We collect and use this location-related data in order to
 - Provide you with services you have purchased or requested
 - Deliver content that is relevant to you based upon your location
 - Deliver The Wellbeing Doctors marketing or content that is relevant to you based on your location
 - Protect against abuse or misuse of services or of your account
 - Improve our site and services
- You may disable the collection and use of your location data through your browser-, operating system- or device-level settings. Consent concerning location data may be withdrawn at any time by changing these settings.

- From other sources
 - In addition to the information we collect from you through The Wellbeing Doctors Services, we may receive information about you from other sources, such as public databases, strategic and joint marketing partners, social media pages and platforms, people with whom you are friends or otherwise connected on social media platforms, as well as from other third parties.

You do not have to provide us with certain Personal Information, however, if you do not provide or enable us to collect the necessary information, we may not be able to provide The Wellbeing Doctors Service. If you disclose any Personal Information relating to other people to us or to our service providers in connection with The Wellbeing Doctors Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

4. How Personal Information May Be Used

We may use your Personal Information for legitimate business purposes, including:

- **To provide the functionality of The Wellbeing Doctors Services and related support.**
 - To create, and administer accounts, fulfill and record transactions, and provide you with related assistance (e.g. wellbeing help, answer inquiries relating to Personal Information, etc.).
 - To send administrative information to you, for example, information regarding our services and changes to our terms, conditions, and policies.
 - We collect information about your health status when you voluntarily complete the health assessment. Only yourself and The Wellbeing Doctors staff / assigned clinicians will be able to look at this data and this will not be shared with any other party unless you ask us to do otherwise. The health assessments exist in order that you can monitor your health and wellbeing, as a snapshot in time and also over any given time period. This provides the Client the insights required to decide if they require further professional help from The Wellbeing Doctors, or any other appropriately qualified Lifestyle Physician. This is in accordance with The Wellbeing Doctors's Consumer Agreement and the liabilities that lie there, within.
- We will engage in these activities to manage our contractual relationship with you, with your consent, and/or to comply with a legal obligation.
- **To provide you with marketing and promotional materials and opportunities and facilitate social sharing.**
 - To send you The Wellbeing Doctors marketing communications and offer other materials that we believe may be of interest to you, such as to send you newsletters or other direct communications.
 - To allow you to participate in sweepstakes, contests or similar promotions.
 - To facilitate social sharing functionality if you choose to do so.
- We will engage in this activity with your consent, to manage our contractual relationship with you, or where we have a legitimate interest. (Note: Health and fitness tracker data that is obtained via third parties will not be used for this purpose).
- **For reporting and trending.**
 - To better understand you and our other users, so that we can tune and personalise our offering.
 - For trending and statistics, and to improve our products and services
- We will engage in this activity because we have a legitimate interest.
- **To accomplish our business purposes.**
 - For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.
 - For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.
 - For responding to legal duties, such as requests from public and government authorities.
 - To defend our legal rights or those of others.
- We will engage in these activities to comply with a legal obligation or because we have a legitimate interest.



We do not allow third parties to contact you outside of the clauses set in the Partners Terms of Service, nor indeed the Consumer Agreement.

To the extent that we process your Personal Information based on your consent, you may withdraw your consent at any time.

5. What and How Personal Information May Be Disclosed

Certain privacy laws require that we disclose certain information about the categories of Personal Information (as defined by applicable law) that we have disclosed for a business purpose as well as the categories that we have “sold” as defined under applicable law.

Disclosed for a business purpose. In general, we may disclose the following categories of Personal Information (as described above in more detail) to our Partners and Service Providers to provide The Wellbeing Doctors services if clinically appropriate and if this acts in your best interests:

- Contact details,
- Personal details,
- Financial and transaction data,
- Health and fitness tracker data collected from heart rate monitors and other performance monitoring activities,
- Other The Wellbeing Doctors Services related data,
- Geolocation data,
- Online identifiers, and
- Cookie-related data.

We do not sell your data.

We may disclose your Personal Information:

- To our partners for the purposes described in this Privacy Policy. The Wellbeing Doctors is the party responsible for the management of the jointly-used Personal Information.
- To our integrated partners and service providers who provide services to us or to our Partners, such as website hosting, data analysis, payment processing services, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, auditing and other similar services.
- To our Partners if you are a Client and are using our The Wellbeing Doctors Services to interact with that Partner. Please contact the Partner you interact with directly for more information on that Partner’s privacy practices.
- To third parties to permit them (or their own customers) to send you marketing communications, consistent with your choices if you allow us to do so.
- To sponsors of sweepstakes, contests and similar promotions, consistent with your choices.
- To you, through message boards, dashboards, challenges, chat, profile pages and blogs and other services to which you are able to post information and materials, including as described in the sections below titled “Testimonials, Ratings and Reviews” and “Public Forum.”
- To other website users as well as to your social media account provider, in connection with your social sharing activity, such as if you connect your Facebook account to your The Wellbeing Doctors account or our social media pages.
- In the context of a corporate transaction. If The Wellbeing Doctors is involved in a sale or business transaction (e.g., merger or acquisition), The Wellbeing Doctors will retain a legitimate interest in disclosing or transferring your Personal Information to other parties in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), including in any

negotiations leading to such. Such parties may include, for example, an acquiring or target entity and its advisors.

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use it for all the purposes for which we use and disclose Personal Information. In some instances, we may combine Other Information with Personal Information. If we combine any Other Information with Personal Information, we will treat the combined information as Personal Information.

6. Privacy Rights regarding your Personal Information

This section provides specific information for UK residents as required under the jurisdictions and regulations that allow for individual privacy rights such as the European Economic Area, the United Kingdom, and the General Data Protection Regulation ("GDPR").

Explanation of Individual Rights

Right to a Copy/Access or Portability: You may have the right to request, free of charge, a copy of the specific pieces of Personal Information that we have collected about you in a readily useable format that allows you to transmit this information to another entity without hindrance.

Right to Know: You may have the right to request, free of charge, that we provide certain information about how we have handled your Personal Information, including the categories of Personal Information collected; categories of sources of Personal Information; business and/or commercial purposes for collecting your Personal Information; categories of third parties/with whom we have shared your Personal Information; and whether we sell any categories of Personal Information to third parties (however, we do not sell your Personal Information).

Right to Deletion: You may have the right to request deletion of your Personal Information that we have collected, subject to certain exemptions. Please note that we may need to retain certain information for record keeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase or promotion). We may also retain residual information, such as records to document that your request has been fulfilled.

Right to Non-Discrimination: You may have the right not to receive discriminatory treatment on the basis of exercising your privacy rights under applicable law.

Right to Correct/Rectify: You may have the right to rectify any incorrect Personal Information we may hold about you.

Right to Object/Restrict: You may have the right to object to a specific use of your Personal Information as it is laid out in this Privacy Policy subject to our legitimate business interests.

Submitting a Request

Where applicable law allows for such a right, if you would like to request to access, correct, object to the use, restrict or delete Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may submit a request through The Wellbeing Doctors Services themselves or contact us tech@thewellbeingdoctors.com with the subject line "Data Subject Request". We will respond to your request consistent with applicable law.

If you are a Client you may, depending on The Wellbeing Doctors Service utilised, be able to access, correct or request deletion of Personal Information that you have previously provided to us through your online customer account. These Data Subject Requests and other rights, including objection, restriction and portability (to the extent this right to data portability is provided to you by applicable law), can also be made directly to the relevant Partner. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. Where applicable law allows for an authorised agent to submit such a request, please contact us at tech@thewellbeingdoctors.com with the subject line "Data Subject Request – Agent Request" and someone will be in touch with the agent and the Client to verify the request. We will try to comply with your request as soon as reasonably practicable. Moreover, where you are a Client, The Wellbeing Doctors may need to forward your request and refer you to your Partner who may be better placed to address your request.

If you are under 18 years of age and a user of The Wellbeing Doctors Services, you may also be entitled to ask us to remove content or information that you have submitted to The Wellbeing Doctors Service by submitting a request to tech@thewellbeingdoctors.com. Please note that your request does not ensure complete or comprehensive removal of the content or information if doing so infringes on the rights of another client.

7. Your choices regarding our use and disclosure of information

Except for health and fitness tracker data that is obtained via third parties, information we collect may be used by The Wellbeing Doctors for marketing purposes such as one-off promotional emailing, mobile text messages, direct mail, and sales contacts. We give you many choices regarding our use and disclosure of your Personal Information for marketing purposes. You may:

- **Opt-in or opt-out from receiving electronic communications from us:** If you are a client of the The Wellbeing Doctors or use our Website and no longer want to receive marketing-related emails or mobile text messages from us on a going-forward basis, you may opt-out of receiving these marketing-related emails or mobile text messages by changing your preferences by unsubscribing. If you have provided your information to The Wellbeing Doctors, and opt-out, The Wellbeing Doctors will put in place processes to honour your request. This may entail keeping some information for the purpose of remembering that you have opted-out.

We will try to comply with your request(s) as soon as reasonably practicable. Please also note that if you do opt-out of receiving marketing-related emails from us, we may still send you messages for administrative, transactional or other purposes directly relating to your use of the The Wellbeing Doctors Services, and you cannot opt-out from receiving those messages.

Our mobile applications may also send push notifications to your mobile device, provided you consented to this. If you have previously consented to receiving push notifications and no longer wish to receive them, you can also turn push notifications off at the device level. The applications may also request access to your device's calendar application, storage, Bluetooth, camera, and microphone. If you have previously allowed access to your device's calendar and no longer wish to allow access, you may edit the application settings at the device level.

8. Tracking and Advertising

We, our service providers and partners may collect Other Information and certain Personal Information in a variety of ways. We and/or our service providers may employ various tracking technologies, such as cookies, web beacons and analytics software, that help us better manage content on The Wellbeing Doctors Services by informing us what content is effective.

9. Social Media Features and Widgets

The Wellbeing Doctors Services includes social media features such as the Facebook Like button, and widgets, such as the Share This button or interactive mini-programs that run on our websites. These features may collect your IP address, which page you are visiting on our websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our websites. Your interactions with these features are shared with such third parties and governed by the privacy policy of the company providing it.

10. Public Forum

Our websites offer publicly accessible message boards, blogs, and community forums. Please keep in mind that if you disclose Personal Information through The Wellbeing Doctors public message boards, blogs, or forums, as offered through The Wellbeing Doctors Services, this information may be viewed, collected and used by others. To request removal of your Personal Information from our blog or community forum, contact us at tech@thewellbeingdoctors.com. In some cases, we may not be able to remove your Personal Information or some content (if, for example, it is reposted by another user), in which case we will let you know if we are unable to do so and why.

11. Sign-In Services

You will be able to log in to some of The Wellbeing Doctors Services using sign-in services such as Facebook Connect, Google or an Open ID provider. These services will authenticate your identity and provide you the option to share certain Personal Information with us such as your name and email address to pre-populate our sign-up form. Some services like Facebook Connect give you the option to post information about your activities on our websites to your profile page to share with others within your network. In addition, when using some of our mobile applications we may allow you a chance to tell friends about our services by accessing the contacts in your Facebook or other social media account.

12. Testimonials, Ratings and Reviews

If you submit testimonials, ratings or reviews to The Wellbeing Doctors Services, any Personal Information you include may be displayed in The Wellbeing Doctors Services. If you want your testimonial removed, please contact us at www.thewellbeingdoctors.com. We also partner with service providers to collect and display ratings and review content on our web sites.

13. Payment Processors

We currently use payment processors as a Third Party Offering for internet-based payment services. If you wish to make a payment through The Wellbeing Doctors Services, your Personal Information may be collected by such third parties directly and not by us, and will be subject to the third party's privacy policy. We have no control over, and are not responsible for, third parties' collection, use and disclosure of your Personal Information.

Where a third-party payment processor is utilised as a sub-processor, we have implemented appropriate onward transfer safeguards over your Personal Information. See Section 23 for a list of sub-processors and their applicable privacy policies.

14. Links To Other Websites

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including our Partners and any third party operating any Third Party Offering, site or other products and services used in connection with The Wellbeing Doctors Services. The inclusion of a link does not imply endorsement of the linked site or service by us or by our affiliates.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organisations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organisations through or in connection with The Wellbeing Doctors Services, including our social media pages.

15. Data Retention

We will retain your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide The Wellbeing Doctors Services to you (for example, for as long as you have an account with us or keep using The Wellbeing Doctors Services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

16. Security of Your Information

The security of Personal Information is a high priority at The Wellbeing Doctors. We seek to use reasonable technical, administrative and physical safeguards designed to protect Personal Information within our organisation. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have any questions about the security of your interaction with us please refer to our [Security Policy](#).

17. Use of Service By Minors

The Wellbeing Doctors Services are not directed or targeted at children under the age of sixteen (16), and we request that they do not provide Personal Information through The Wellbeing Doctors Services.

19. Sensitive Information

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g. information related to racial or ethnic origin, political opinions, religion or other beliefs, genetic characteristics, trade union membership or criminal background) on or through The Wellbeing Doctors Services or otherwise to us, except where explicitly requested or consented to.

21. Changes to This Privacy Policy

The Wellbeing Doctors may make changes to this Privacy Policy from time to time. Any changes we make will become effective when we post a modified version of the Privacy Policy. If we make any material changes to the Privacy Policy, we may also notify you by posting notice on our websites or within the applicable The Wellbeing Doctors Services, or by sending you an email. If you continue using The Wellbeing Doctors Services after any notice of any such changes, it means you have accepted them. If you do not agree to any changes, you must stop using The Wellbeing Doctors Services, as applicable. It is your obligation to ensure that you read, understand and agree to the latest version of The Privacy Policy. The “Last Updated” legend at the top of the Privacy Policy indicates when it was last updated.

22. Contact Us

If you have any questions regarding this Privacy Policy you can contact us via email at tech@thewellbeingdoctors.com or via postal mail at:

The Wellbeing Doctors

Clockwise
Edward Pavilion
Albert Dock
L3 4AF
Liverpool