

## **Welcome to the Adheris Health Privacy Notice**

We hope you'll take some time to read this document. It will help you understand everything you need to know about the way Adheris Health collects, uses and shares personal data, and what your legal rights are and how to exercise them.

Adheris Health has tried to keep this as simple as possible and to avoid jargon, and we'll do our best to keep you informed if there are any changes in the way we process your personal data in the future.

Our company takes its responsibility for protecting your data very seriously. We advise you to take the time to become acquainted with our privacy practices. If there's anything here you don't understand, or if you want to ask any questions, please feel free to contact us.

### **Who is the Data Controller?**

We are, Adheris Health.

Registered address: 1 Van de Graaff Drive, Suite 502, Burlington, MA 01803

In this document Adheris Health may be referred to as "we," "us" or "our."

### **What kinds of Personal Data does Adheris Health Process?**

Adheris Health collects personal data for various purposes. With that in mind, we've created a list of the types of personal data that Adheris Health may collect, either directly from you or from other sources, in order to achieve those purposes.

The kinds of personal data we may collect include:

Customer / Client	First and last name, zip code, mobile number, e-mail address password
Patient / Subject	First and last name, zip code, mobile number, e-mail address, password, health information
Supplier / Trader	Contact details, bank details

### **What are the reasons Adheris Health collects Personal Data?**

#### **Legal Obligations**

Adheris Health uses personal data to fulfil any potential contractual obligations we may have. When we request personal data from you or to meet the terms of a contract, you will be required to provide the relevant personal data. In such cases the lawful basis for us to obtain and process personal data is because it is required to meet the terms of a contract.

We are required by law to process personal data for purposes relating to our legal obligations. These include:

- To meet our financial commitments, or as required to give financial authorities.
- To comply with regulatory requirements and any self-regulatory schemes.
- To carry out required business operations and due diligence.
- To cooperate with relevant authorities for reporting criminal activity, or to detect and prevent fraud.
- To investigate any insurance claims, claims of unfair dismissal, claims of any kind of harassment or of discrimination, or any other claim whereby the organization may have to defend itself.

#### **Consent**

Adheris Health may process Personal Data (any information that relates to an identified or identifiable living individual) when Adheris Health has received consent to do so.

You may withdraw your consent for us to process your personal data for these purposes at any time; after a withdrawal of consent request is received, we may have to contact you to verify the request.

Withdrawing your consent for us to process your personal data will not affect the lawfulness of the processing beforehand.

Adheris Health may process Personal Data for the following purposes:

### **Legitimate Interests**

Adheris Health may process Personal Data for any of the following purposes, which are considered to be within our legitimate business interests:

- To provide goods and services where it has been requested,
- To send notification about topics to individuals who have asked to be kept informed,
- To improve the quality of the services we offer, and to better understand customers' needs by requesting feedback, or reviews of the services provided, or sending survey forms,
- To send notifications of any changes to the goods and/or services provided that may affect people,
- To understand the scale of our customer base; for statistical analysis and market research,
- To recognize when people re-engage with our organization,
- To facilitate the completion of research initiatives,
- To allow the organization to support and maintain our products in active service,
- To provide reference information to third party organizations, when necessary,
- To improve the organization's website so content is delivered more efficiently,
- To enhance the security measures in place that protect data we are responsible for,
- To protect the organization's assets

### **Special Category Personal Data**

Adheris Health may process the following kinds of Special Categories of Personal Data, containing health information:

- Where Special Categories of Personal Data are processed, one or more of the following lawful reasons shall apply:
  - Adheris Health has received explicit consent.
  - It is necessary for reasons of public health or for ensuring high standards of quality and safety of health care and of medicinal products.

### **Where does Adheris Health obtain Personal Data from?**

We may collect personal data directly from you in various ways:

- We collect some personal data from publicly accessible sources
- We may also gather personal data by any of the following methods:
  - From technical functionality that gathers data automatically from computer equipment when people visit our online platforms.

- From third-party organizations provided for a specific purpose.

### Who will Adheris Health share your Personal Data with?

To achieve the above stated purposes for which we process your personal data, we may have to share your personal data with certain third parties.

We will make all reasonable efforts to ensure that any third-party we share your personal data with is also compliant with data protection law.

The kinds of third parties we may share your personal data with include:

- **Affiliates:** We may share Personal Data with our subsidiaries and affiliates for purposes consistent with this notice.
- **Customers:** We may share Personal Data, analytics, and insights from our databases with our customers in connection with providing our services to those customers.
- **Companies and people who work for us:** We contract with other companies and individuals to help us provide services. For example, we may host some information on another company's computers, hire technical consultants to maintain our sites, or work with companies to remove repetitive information from customer lists, analyze data, provide marketing assistance, and provide customer service. In addition, we may validate your identity and other information against available databases. In order to perform their services, these other companies may have limited access to some of the Personal Data we maintain about our users. Other companies may collect information on our behalf through their websites or applications. We require that such companies not use your information for any purpose other than fulfilling their responsibilities to us. We also require that such companies keep your Personal Data confidential and comply with applicable laws. Adheris Health's practice is to (i) conduct reasonable and appropriate due diligence on our service providers; and (ii) obtain written commitments regarding the processing of Personal Data, including that the service provider will only handle Personal Data in accordance with our instructions; adopt adequate technical and organizational measures to protect your personal data; and not retain Personal Data when it is no longer required for completion of its services. Details of service providers and the countries in which they are based are available from the Adheris Health by contacting its Global Privacy and Data Protection Officer.
- **Promotional and informational offers:** Sometimes we send offers to selected groups of users. To accomplish this, we may use third parties working on behalf of Adheris Health. We provide a variety of mechanisms for you to tell us you do not want to receive such promotional or informational offers. For example, where required by law, we may provide an opt-in box for customers to receive information that is sent by a third-party fulfillment house, and we make clear that, by opting in, you are submitting your data to a third party. You can elect not to receive promotional or informational material from us by following the instructions to opt-out as mentioned or included in each of our programs we send to you.
- **Business partners.** We may share the information we collect with our prospective or current customers, and other business partners who work with us.
- **Professional advisors:** We may disclose Personal Data to professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- **Business transfers:** If we transfer a business unit or an asset (such as hosting the Adheris Health website) to another company, we may transfer the Personal Data we have collected to the relevant third party as well.
- **Legal requirements:** We may be obligated to cooperate with various law enforcement inquiries. Adheris Health reserves the right to share or transfer your information to comply with a legal requirement, disclose any activities or information about you to law enforcement or other government officials as we, at our sole discretion, determine necessary or appropriate, in connection with an investigation of fraud, for the administration of justice, intellectual property infringements, or other activity that is illegal or may expose us or you to legal liability. We may release information if, in our judgment the release may be necessary to prevent the death or serious injury of an individual.

## **Where will Adheris Health store your Personal Data?**

As a part of our standard business practices, we may transfer your personal data to organizations based in countries that have not been granted an adequacy decision under the General Data Protection Regulation. Where data is transferred to such countries, we will ensure that specific safeguards or derogations have been established.

These might include where the data transfer is necessary in order to fulfil a contract, where we have received specific consent or where approved standard contractual contracts are in place between us and the third-parties involved that ensure the recipient organization has a suitable standard of data protection in place. Adheris Health will never sell or rent personal information to third parties for marketing purposes.

## **How long will Adheris Health keep your Personal Data?**

We will keep your personal data only for as long as required to achieve the purposes for which it was collected, in line with this privacy notice.

The following criteria are what determine the length of time we will keep your personal data:

Adheris Health will retain your Personal Data for as long as your account is active; as needed to provide you products or services; as needed for the purposes outlined in this Privacy Notice or at the time of collection; as necessary to comply with our legal obligations (e.g., to honor opt-outs), resolve disputes, and enforce our agreements; or to the extent permitted by law. Adheris Health does not retain Personal Data after it no longer serves the purposes for which it was collected or subsequently authorized. At the end of the retention period, Adheris Health will delete your Personal Data in a manner designed to ensure that it cannot be reconstructed or read.

## **Your Rights, Our Responsibility**

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Adheris Health we take your rights seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

### **The Right of Access**

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us using the details at the end of this notice.

### **The Right to Correct Your Personal Data**

If you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

### **The Right to Erasure**

Otherwise known as the 'right to be forgotten,' this gives you the right to request your personal data be deleted.

This is not an absolute right: if you were to request that we erase your personal data, we would erase as much of that data as we could but may have to retain some information if it is necessary.

When we have received a request for personal data to be erased, if it is necessary for us to retain some of that information, we will ensure that the remaining data is used only when and where it is absolutely necessary.

### **The Right to Objection**

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely. This means you can stop or prevent Adheris Health from using your data.

### **The Right to Complain**

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organization. To achieve this, we request that any complaints first be brought to our attention so we can properly investigate matters. If you would like to complain about Adheris Health to a regulatory body, you may do so by contacting your local data protection supervisory authority.

## **California Privacy**

The California Consumer Privacy Act (“CCPA”) provides consumers with specific rights regarding their Personal Information. You have the right to request that businesses subject to the CCPA disclose certain information to you about their collection and use of your Personal Information over the past 12 months. In addition, you have the right to ask such businesses to delete Personal Information collected from you, subject to certain exceptions. If the business sells Personal Information, you have a right to opt-out of that sale. Finally, a business cannot discriminate against you for exercising a CCPA right.

When offering services to its customers, Adheris Health acts as a “service provider” under the CCPA and our receipt and collection of any consumer Personal Information is completed on behalf of our customers in order for us to provide the Service. Please direct any requests for access or deletion of your Personal Information under the CCPA to the customer with whom you have a direct relationship.

## **Do not Track**

Certain state laws require us to indicate whether we honor “Do Not Track” settings in your browser. Adheris Health adheres to the standards set out in this Privacy Policy and does not monitor or follow any Do Not Track browser requests.

## **NHS National Data Opt-Out**

Information about your health and care helps the NHS to improve your individual care, speed up diagnosis, plan your local services and research new treatments.

In May 2018, the strict rules about how this data can and cannot be used were strengthened. You can choose whether your confidential patient information is used for research and planning.

To find out more visit: <https://www.nhs.uk/your-nhs-data-matters/>

## **Adheris Health Contact Details**

Privacy Office, Adheris Health  
1 Van de Graaff Drive, Suite # 502, Burlington, MA 01803  
[data.privacy@adherishealth.com](mailto:data.privacy@adherishealth.com)

## **Who is the Adheris Health Data Protection Officer?**

Ametros Group Ltd  
Lakeside Offices, Thorn Business Park  
Rotherwas Industrial Estate  
Hereford  
Herefordshire  
England  
HR2 6JT  
0330 223 2246  
[dpo@ametrosgroup.com](mailto:dpo@ametrosgroup.com)  
[www.ametrosgroup.com](http://www.ametrosgroup.com)

## **Who is the Adheris Health EU Representative?**

Ametros Ltd  
Unit 3D  
North Point House  
North Point Business Park  
New Mallow Road  
Cork  
Ireland  
[gdpr@ametrosgroup.com](mailto:gdpr@ametrosgroup.com)  
[www.ametrosgroup.com](http://www.ametrosgroup.com)