

UK PRIVACY NOTICE FOR CLINICIANS & PATIENTS

ADHD Link Pty LTD is registered with the UK's Information Commissioner's Office.

Registration Number: ZB580681

ADHD Link Pty Ltd (Australian Company number 58 665 595 764) (**we, us or our**), understands that protecting your personal data is important. The UK GDPR sets out the requirements of personal data in respect of what needs to be included in a Privacy Notice. This Privacy Notice sets out our commitment to protecting the privacy of personal data provided to us, or otherwise collected by us when providing our website service. The purpose of our platform service is to provide relevant medical and mental health information to assist clinicians performing a mental health assessment. Our website platform is not a substitute for a full medical assessment by a trained health professional. Information provided to the clinician must not be relied upon by the clinician for the purposes of diagnosis or treatment: The responsibility of the final decision regarding diagnosis and treatment rests on the clinician.

It is important that you read this Privacy Notice together with any other detailed privacy notices we may provide when we are collecting or processing personal data about you so that you understand our privacy practices in relation to your data.

The information we collect

Personal information: is information that relates to an identified or identifiable individual.

We may collect, use, store and disclose different kinds of personal data about you which we have listed below:

- **Identity Data** including first name, middle name, last name, maiden name, title, date of birth, gender, job title, photographic identification, marital status, title.
- **Contact Data** including billing address, delivery address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details (through our third party payment processor, E.g Stripe or Pay Pal or Go Cardless).
- **Background Verification Data** including your passport number, driver licence number, photographic identification or other details requested as part of our verification process to comply with our due diligence obligations, anti-money laundering laws and related ongoing monitoring commitments.
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Profile Data** including your username and password for our platform, profile picture, purchases or orders you have made with us, support requests you have made, content you post, send receive and share through our platform, information you have shared with our social media platforms, your interests, preferences, feedback and survey responses.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **Special Categories of Personal Data** is a special category of personal data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health and genetic and biometric data. The types of special categories of data we collect include information relevant to a comprehensive mental health assessment. Health data is captured that is relevant for a mental health assessment. Data captured includes information on biological, psychological and social information.

How we collect personal information

We collect personal data in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you register for an account, through the 'contact us' form on our website or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as e.g. when you use our website, in emails, over the telephone and in your online enquiries. When patients discuss things with their clinician, the clinician may record those details on the online platform.
- **From third parties:** We collect personal information from third parties, such as from your employer where they invite you to access our Services and details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.
- **From public registers.** If you are a clinician, your publicly listed registration details may be accessed, verified and stored from public databases for regulatory reasons.

Purposes and legal bases for processing

We collect and process personal data about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please reach out to us if you need further details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose of use / disclosure | Type of Data | Legal Basis for processing |
|---|---|---|
| To enable you to access and use our software, including to provide you with a login. | <ul style="list-style-type: none"> ● Identity Data ● Contact Data | <ul style="list-style-type: none"> ● Performance of a contract with you |
| To assess whether to take you on as a new client, including to perform anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks on you. | <ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Background verification Data | <ul style="list-style-type: none"> ● Performance of a contract with you ● To comply with a legal obligation ● Public interest ● Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities for example terrorism |
| To provide our Services to you, including to manage your appointments.. | <ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Medical and mental health data | <ul style="list-style-type: none"> ● Performance of a contract with you |

| Purpose of use / disclosure | Type of Data | Legal Basis for processing |
|---|--|--|
| To contact and communicate with you about our Services, including in response to any support requests you lodge with us or other enquiries you make with us. | <ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data | <ul style="list-style-type: none"> • Performance of a contract with you |
| To contact and communicate with you about any enquiries you make with us via our website. | <ul style="list-style-type: none"> • Identity Data • Contact Data | <ul style="list-style-type: none"> • Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions. |
| For internal record keeping, administrative, invoicing and billing purposes. | <ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data | <ul style="list-style-type: none"> • Performance of a contract with you • To comply with a legal obligation • Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our [terms of business] and any other administrative points. |
| For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms. | <ul style="list-style-type: none"> • Profile Data • Technical and usage Data | <ul style="list-style-type: none"> • Legitimate interests: to keep our website updated and relevant, to develop our business, improve our Services and to inform our marketing strategy |
| For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you. | <ul style="list-style-type: none"> • Identity Data • Contact Data • Technical and usage Data • Profile Data • Marketing and communications Data | <ul style="list-style-type: none"> • Legitimate interests: to develop our Services and grow our business |
| To run promotions, competitions and/or offer additional benefits to you. | <ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data • Interaction Data • Marketing and communications Data | <ul style="list-style-type: none"> • Legitimate interests: to facilitate engagement with our business and grow our business |
| If you have applied for employment with us; to consider your employment application. | <ul style="list-style-type: none"> • Identity Data • Contact Data • Professional Data | <ul style="list-style-type: none"> • Legitimate interests: to consider your employment application |
| To comply with our legal obligations or if otherwise required or authorised by law. | | <ul style="list-style-type: none"> • To comply with a legal obligation |

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services. Further information about your rights is available below.

Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers;

- marketing or advertising providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as Stripe, Go Cardless or PayPal
- our existing or potential agents or business partners;
- sponsors or promoters of any promotions or competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- third parties to collect and process data, such as [Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time) and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas transfers

Amazon Web Services (AWS) servers which store information, are based within the UK.

Where we disclose personal data to the third parties listed above, these third parties may store, transfer or access personal data outside of the United Kingdom. The level of data protection in countries outside of the United Kingdom may be less comprehensive than what is offered in the United Kingdom. Where we transfer your personal data outside of the United Kingdom, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal data in accordance with this Privacy Notice. This includes:

- only transferring your personal data to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal data; or
- including standard contractual clauses in our agreements with third parties that are overseas.

Data retention

We will only retain your personal data for as long as reasonably 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 data 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.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Your rights and controlling your personal data

Your choice: Please read this Privacy Notice carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Notice. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Notice. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Access, correction, processing and portability: You may request details of the personal data that we hold about you and how we are processing it (commonly known as a "data subject request"). You may also have a right in accordance with applicable data protection law to have your personal data rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organisation.

Unsubscribe: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Withdraw consent: Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues (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.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our online Services. They include, for example, cookies that enable you to log into secure areas of our online Services, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** These are cookies that allow us to recognise and count the number of visitors to our online Services and to see how visitors move around our online Services when they are using them. This helps us to improve the way our online Services work, for example, by ensuring that users find what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our online Services. These cookies enable us to personalise our content for you and remember your preferences (for example, your choice of language or region).

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

| Cookie | Purpose |
|--------------|---|
| Currency | This cookie stores the currency used for the online Services |
| Language | This cookie stores the language used for the online Services (English) |
| PHPSESSIONID | This cookie contains a unique ID to support functions (for example last viewed products) to improve user experience |
| newsbcsb | This cookie is stored once the user has completed or closed the Register Pop Up, preventing it from re-appearing until after 7 days |
| TLSCookiesEU | This cookie tracks when a user has accepted that the online Services use cookies preventing the |

| | |
|-------------------|---|
| | popup from being displayed again during that session |
| _ga / _gid / _gat | These cookies are used by our Google Analytics account to track customer traffic through the website to help us understand how our website is being used by our customers |

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Notice.

Personal information from social network accounts

If you connect your account with us to a social network account, such as Facebook, Google or Microsoft, we will collect your personal information from the social network. We will do this in accordance with the privacy settings you have chosen on that social network.

The personal information that we may receive includes your name, ID, user name, handle, profile picture, gender, age, language, list of friends or follows and any other personal information you choose to share.

We use the personal information we receive from the social network to create a profile for you on our platform.

We will not post to your social network without your permission.

Use of Google API Services (this section applies to personal information accessed through Google API Services)

We use Google's Application Programming Interface (**API**) Service.

Our use of information received from Google APIs will adhere to the [Google API Services User Data Policy](#), including the Limited Use requirements (set out in the Google API Services User Data Policy).

We limit our use of the personal information that we collect to providing or improving our Services. We do not use the personal information for any other purposes.

We only transfer the personal information to others if it is necessary to provide or improve our Services or as necessary to comply with applicable law or as part of a merger, acquisition or sale of assets where we notify you of this.

We do not use or transfer the personal information for serving ads, including retargeting, personalised or interest based advertising.

We don't allow humans to read the personal information unless

- we have first received your consent to view specific messages, files or other data;
- it is necessary for security purposes (such as investigating a bug or abuse);
- our use is limited to internal operations and the personal information (including derivations) have been aggregated and anonymised.

These restrictions apply to the raw data we obtain from the restricted scopes and data that is aggregated, anonymised or derived from them.

We have policies and procedures in place setting out appropriate safeguards for protecting your personal information obtained with the Google APIs. We will also ensure that our employees, agents, contractors and successors comply with the Google API Services Data Policy.

Use of geo-localisation data

We may collect your precise or approximate location via our mobile application for the following purposes:

- To enable provision of services most appropriate to your country
- as permitted by law.

We collect this information when our mobile application is open (whether on-screen or not). If you do not want us to use your location for the purposes above, you should turn off the location services in your account settings in the mobile application or in your mobile phone settings. If you do not provide location information to us, we may not be able to provide our Services to you.

Amendments

We may change this Privacy Notice from time to time. We will notify you if we make a significant change to this Privacy Notice, by contacting you through the contact details you have provided to us and by publishing an updated version on our website.

For any questions or notices, please us at: privacy@adhdlink.com

ADHD Link Pty Ltd (Australian Company number 58 665 595 764)

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