

MINDS FOR LIFE - PRIVACY POLICY AND COOKIE POLICY

This privacy and cookie policy (**Policy**) describes the personal data collected or generated (processed) when you use Minds for Life's mobile applications (**our Apps**) and Minds for Life's website (**our Site**). Our Policy describes the types of personal data collected when you use our Apps and our Site and how your personal data is used, shared and protected. It also explains the choices you have relating to your personal data and how you can contact us.

Who is responsible for the processing of your personal data?

The entity responsible for the processing of your personal data is Mindzone Group Limited of Peninsular House, 36 Monument Street, London, EC3R 8LJ

What personal data we collect and when

We ask you for certain personal data to provide you with the services you request. For example, when you decide to start a free trial of our services, buy a subscription, request to receive communications, create an account, interact with our Site, use our Apps, participate in a counselling session with us, engage in in-app messaging with us or use the forums on our Apps. This personal data includes your:

- Account Data: Login and account information, including screen name, password and unique user ID
- Contact Data: Contact details including name, email, telephone number and physical address
- Identity Data: other personal details identifying you including gender and date of birth
- Health Data: Data about your health, in particular your mental health including: goals; journal entries, mood data, health data, forum incidents, our counsellor's observations, details from video chats, details from messaging chats and safeguarding status
- Preferences Data: Personal preferences including your marketing and cookie preference

Technical Data: When interacting with our Site and our Apps, data is automatically collected and shared with Minds for Life by the technology platforms providing the experience. For example, your web browser or mobile device may share certain data with Minds for Life as those devices interact with Minds for Life's Site or App. More information about these practices is included in the Cookies and Pixel Tags section below. This data includes:

- device IDs, call state, network access, storage information and battery information
- cookies, IP addresses, referrer headers, data identifying your web browser and version, and web beacons and tags

Payments are not processed by us; we do not receive details of your payment card. We use online payment service providers, Stripe or Apple Pay, which will encrypt your card details in a secure environment. If you have asked Stripe or Apple Pay to remember your debit or credit card details in readiness for your next purchase, Stripe or Apple Pay will securely store your payment details on its systems. These details will be fully encrypted and only be used to process transactions which you have authorised.

Tools to manage what we collect

When using our Apps, we also inform you about our collection through standard permissions in app stores, mobile operating systems, and in the App experience. We also prompt you for your consent where necessary.

In many cases, your web browser or mobile device platform will provide additional tools to allow you to control when your device collects or shares particular categories of information. For example, your mobile device or web browser may offer tools to allow you to manage cookie usage or location sharing. We encourage you to familiarise yourself with and use the tools available on your devices.

Why and how we use (process) your personal data

We use the personal data we collect from you in the following ways:

To provide the features of our Apps, Site and services you request

When you use our Apps and Site, we will use your data to provide the service you have selected. For example, if you purchase a subscription on our Apps we will use your Health Data to provide the service to you.

To keep you and others safe

Our aim is to keep the services we provide to you confidential.

There are times though when, if we are really concerned about you and think that you are at risk or a danger either to yourself or others, we will talk to you about the need for us to contact somebody outside the Minds for Life counselling team to know what has happened or what is happening to you. We will only do this if your life is at risk because of something you are doing or you are at risk from somebody else or you are a risk to somebody else. If Minds for Life counsellors believe that you are at serious risk to yourself, they may refer you to more appropriate services.

To communicate information about our services and for other promotional purposes

If you opt-in to receive information from Minds for Life about our other services that may be interesting for you, we will use your Contact Data to send you this information. If you later decide you do not wish to receive these personalised communications you may opt out of doing so by contacting us on the email address given under the "How to Contact Us" section at the end of our Policy or clicking on the opt-out link at the end of that communication.

To operate, improve and maintain our business and services

We will use the data you provide to us to provide the services to you and to improve our business operations and processes. For example, we may use your Technical Data to enhance your user experience and to help us diagnose technical and service problems and administer our Apps and Site.

To protect our or others' rights, property or safety

We may also use data about how you use our Apps and Site to prevent or detect fraud, abuse, illegal uses and violations of our Apps and Site terms and to comply with court orders, governmental request or applicable law.

For general research and analysis purposes

We use Technical Data to understand customer behaviour or preferences. For example, we may use information about how App users search for and find services to better understand the best ways to organize and present service offerings in our Apps.

Use (processing) of Health Data

As discussed above, we will collect Health Data in order to provide our Apps and other services to you. Your Health Data is sensitive personal data and will be treated by us as such and it will be kept secure and only used for the purpose of providing to you the Apps and associated services including counselling and recovery for which you have subscribed. By opening an account, subscribing to our Apps or other services, which require provision of Health Data you consent to our collection and use of your health information for the provisions of those services to you. You understand that we may share your health information with third parties such as health professionals, emergency services, next of kin or friends where we believe that your life is at risk because of something you are doing or you are at risk from somebody else or you are a risk to somebody else.

You can also request us to update or delete your Health Data by emailing us. See the “Your Rights” and “How to Contact Us” sections at the end of our Policy.

Other purposes

We may also use your personal data in other ways and will provide specific notice at the time of collection and obtain your consent where necessary to the use of your personal data for other purposes not already specified in our Policy.

Sharing of your personal data

Minds for Life’s sharing

Minds for Life shares your personal data as follows:

- Third party service providers processing data on Minds for Life’s behalf to facilitate the provision of the services to which you have subscribed, for example to those who process payments, manage and service our data, distribute emails, carry out research and analysis, manage brand and service promotions, as well as those administering certain services and features on our behalf. However, your Health Data is not shared with any of these third parties,
- Other third party health care professionals, emergency services, your next of kin or friends where we believe that your life is at risk because of something you are doing or you are at risk from somebody else or you are a risk to somebody else.
- Other third parties to the extent necessary to: (i) comply with a government request, a court order or applicable law; (ii) prevent illegal uses of our Apps and Site or breaches of our Site’ and the Apps’ Terms and our policies; (iii) defend ourselves against third party claims; and (iv) assist in fraud prevention or investigation.

We may also transfer personal data we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, spin-off, dissolution or liquidation).

We carry out research to improve our services working with research partners such as universities. Any data we provide to our research partners is anonymised and aggregated so your personal data is not disclosed.

Your sharing

Each of our Apps has a forum where you can share your experiences with other subscribers and with our counsellors.

As we explain on each forum, it is important that you choose a screen name which ensures that you stay anonymous on the forum. Do not use your real name or any personal information in your forum screen name.

In posting to the forum ensure that you do not include any information which could lead to you or anyone else being identified.

Protection and management of your personal data.

- **Encryption & Security:** We use a variety of security measures, including encryption to maintain the safety of your personal data. Your personal data is contained behind secured networks and is only accessible by a limited number of people who have special access rights to such systems for the purposes of providing, maintaining and supporting the services which we provide to you.
- **International data transfers:** The personal data we collect or generate (process) in the context of our Apps and Site will be stored in the European Economic Area.

Some of the data recipients with whom Minds for Life shares your personal data (excluding your Health Data) may be located in countries other than the country in which you are located and from where your personal data was originally collected. The laws in those countries may not provide the same level of data protection compared to the country in which you are located and from which you initially provided your data. Nevertheless, when we transfer your personal data to recipients in other countries we will protect that information as described in our Policy and in compliance with applicable law including ensuring adequacy of the protection of personal data in accordance with the laws of the recipient country, or putting in place European Union Standard Contractual Clauses, or putting in place other contractual clauses for protection of personal data that are approved by local data protection regulators, or in reliance on recognised certification of processing of personal data to a certain standard, for example EU-US Privacy Shield.

- **Retention of your data:** We retain your personal data for as long as necessary to fulfil the purposes for which we collect it. i.e. until we have terminated the services, after you or we close your account, after you opt out of receiving material from us. We may keep a copy of your personal data for so long as required to do so by law or statutory regulation.
- You also have the ability to request that we delete your personal data at any time. This may result in us no longer being able to provide the services to you.

Your Rights

- **Right to request a copy of your information**

You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or all of your data, please:

- email, call or write to us (see the “How to Contact Us” section below)
- let us know the information you want a copy of, including any account or reference numbers, if you have them, and
- we may charge a small fee (£10) for this service if your requests are unfounded or excessive, for example, if you ask us repeatedly for the same data.

- **Right to correct any mistakes in your information**

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please:

- email, call or write to us (see “How to Contact Us” section below)
- let us have enough information to identify you (eg account number, user name, registration details), and
- let us know the information that is incorrect and what it should be replaced with

- **Right to ask us to stop sending you material**

You can ask us to stop sending you material that we think you might be interested in. If you would like to do this, please:

- email us (see “How to Contact Us” section below). [You can exercise your right to prevent such processing by clicking on the ‘unsubscribe’ button at the bottom of the email newsletter. It may take up to [5] days for this to take place]
- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone)

- **Right to request deletion of your data**

You can ask us to delete your data. If you would like to do this then please email us using the information in the “How to Contact Us” section below. If you have an active account and you ask us to delete your data then your account will be closed. You will no longer have access to the App or any forum. We will also not be able to reopen your account or process any orders placed by you for subscriptions following deletion of your data without you providing your data again.

We may ask for proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill) in order to verify your identity before carrying out your requests.

Cookies and pixel tags

Minds for Life receives and records information, which may include personal data, from your browser when you use our Site. We use a variety of methods, such as cookies and other similar tracking technologies such as web beacons, action tags, local shared objects (‘flash cookies’), single-pixel GIFS and pixel tags to collect this information, which may include your (i) IP-address; (ii) unique cookie identifier, cookie information and information on whether your device has software to access certain features; (iii) unique device identifier and device type; (iv) domain, browser type and language, (v) operating system and system settings; (vi) country and time zone; (vii) previously visited websites; (viii) information about your interaction with our Site such as click behaviour, purchases and indicated preferences; and (ix) access times and referring URLs. (A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our Site.)

Third parties may also collect information via our Site through cookies, third party plug-ins and widgets. These third parties collect data directly from your web browser and the processing of this data is subject to their own privacy policies. More information on the identity of these third parties and their privacy policies is provided below:

Cookies, third party plug-ins and widgets	What it does	How to turn it off	What happens if you turn it off	Privacy Policy
Google Analytics (Website)	We use Google Analytics software to collect information about how you use mindsforlife.com. We do this to help make sure the site is meeting the needs of its users and to help us make improvements.	Opt out here	We can no longer collect information on how you use the website.	
YouTube Embedded Links (Website)	We have embedded YouTube videos into our website using YouTube's embed code. This means YouTube may set multiple 3rd party cookies.	Find out more about the YouTube cookies on their website.		

We use cookies and pixel tags to track our customer's usage of our Site and to understand our customer's preferences. This enables us to provide services to our customers and improve their online experience. We also use cookies and pixel tags to obtain aggregate data about site traffic and site interaction, to identify trends and obtain statistics so that we can improve our Site. There are generally three categories of cookies used on our Site:

- Functional:** These cookies are required for basic site functionality and are therefore always enabled. These include cookies that allow you to be remembered as you explore our Site within a single session or, if you request, from session to session. They assist in security issues and conforming to regulations.
- Performance:** These cookies allow us to improve our Site' functionality by tracking usage. In some cases, these cookies improve the speed with which we can process your request, allow us to remember site preferences you have selected. De-selecting these cookies may result in poorly-tailored recommendations and slow site performance.
- Social media and advertising:** Social media cookies offer the possibility to connect you to your social networks and share content from our Site through social media. Advertising cookies (of third parties) collect information to help better tailor advertising to your

interests, both within and beyond our Site. In some cases, these cookies involve the processing of your personal data. De-selecting these cookies may result in seeing advertising that is not as relevant to you or you not being able to link effectively with Facebook, Twitter, or other social networks and/or not allowing you to share content on social media.

You can always change your preference by visiting the "Cookie Settings" at the bottom of each page of our Site.

For a comprehensive and up-to-date summary of every third-party accessing your web browser (through Minds for Life Site or otherwise), we recommend installing a web browser plugin built for this purpose. You can also choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings on each browser and device that you use. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you may not have access to many features that make our Apps and Site more efficient and some of our services will not function properly.

Using Minds for Life App and Site with third-party products and services

Our Apps and Site may provide links to other (third-party) websites and apps for your convenience or information. Linked sites and apps have their own privacy notices or policies, which we strongly encourage you to review. To the extent any linked websites or apps are not owned or controlled by us, we are not responsible for their content, any use of the websites or apps, or the privacy practices of the websites or apps.

Changes to our Privacy Policy and Cookie Policy

Applicable law and our practices change over time. If we decide to update our Policy, we will post the changes on our Apps and Site and, where appropriate, will be notified to you via the Apps. We strongly encourage you to read our Policy and regularly check for any changes.

Questions and feedback

We welcome questions, comments, and concerns about our Policy and privacy practices. If you wish to provide any feedback or if you have questions or concerns, please send us an email to the email address given under the "How to Contact Us" section at the end of our Policy.

How to contact us

You can contact us:

- by email, support@mindsforlife.com for questions relating to this Policy or our App Terms
- by email, DPO@xenzone.com for communications relating to your personal data
- by email, hello@mindsforlife.com for all other matters
- by post, at Peninsular House, 36 Monument Street, London, EC3R 8LJ or
- by telephone, on 020 3886 0641

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