

PRIVACY POLICY

VERSION 2.0 – APRIL 2021

1 SCOPE

This privacy policy ("**Privacy Policy**") applies to the usage of the website <https://yourself.health/> ("**Website**") operated by Health Yourself AG ("**Health Yourself**", "**we**", "**our**", or "**us**"). By accessing the Website you ("**User**", "**you**", "**your**", or "**yours**") agree to the collection, usage, and disclosure of information in accordance with this Privacy Policy.

Unless otherwise defined in this Privacy Policy or our Terms, the terms used in this Privacy Policy have the same meanings as in the Swiss Federal Act on Data Protection. Our Terms are available upon request to privacy@yourself.health.

2 PERSONAL DATA

2.1 PERSONAL DATA WE COLLECT

We collect the following types of data when you use our Website:

Contact data	The Contact Data include your name and contact details, such as your delivery address, email and/or telephone number. These data are required to complete a purchase on our website. They are stored as long as legally required. In some cases these data are also asked as part of test activation. In that case the data are required to complete the test analysis.
Medical data	Data regarding prior or current conditions or vaccinations, as well as supporting data such as length, weight and age, may be required to correctly determine the outcome of the test analysis. As well such data may be used in order to provide Users with updated information regarding their health, as part of the purchased service, or to notify Users when retesting is recommended.

Medical data are only collected in "Conversations" available under <https://secure.yourself.health>. We only request such data when they are required to deliver the product correctly, unless explicitly stated otherwise. These questionnaires require creating a user account and logging in with so-called 2-factor authentication. An exception is made for anonymous test results, which can be accessed by using only a unique code, unknown to us. For these tests no personal data is stored or asked. Data in the secure questionnaires may include personal data as well. Order data on the Webshop is not linked to any of the questionnaires.

2.2 PERSONAL DATA WE DO NOT COLLECT

We collect anonymized answers, including anonymized geographical information, in the questionnaires available under <https://talk-to.yourself.health>. Such **anonymized information cannot**

be traced back to individual Users and as such **does not constitute personal data** in accordance with the Swiss Federal Act on Data Protection.

3 HOW WE COLLECT PERSONAL DATA

We collect information about you when you use our Website, including taking certain actions within it.

Means of collection	Explanation	Personal data collected
Directly		
Your use of the questionnaires	Your interaction with, answers to and results of the questionnaire are completely anonymous.	None. The questionnaires available on the Website collect symptoms and statistical data, such as country, age, gender. We may collect anonymous statistical data (as explained above in Section 1.2).
Test activation & results	Data that are required to send you notifications or for our test manufacturers and laboratory partners to deliver their services correctly.	This may include your name, contact details, gender, age, weight and vaccinations. This is a dynamic list. Which exact data are requested depends on the test which the User activates. These data are only recorded when they are required for delivering the requested service.
Your registration to our newsletter	We collect certain data when you sign up to receive our newsletter and other marketing material.	This information includes your name and email address.

4 LEGAL BASIS AND PURPOSES

Our legal basis for collecting and using the personal data described in this Privacy Policy depends on the personal data we collect and the specific purposes for which we collect it.

Legal Basis	Explanation	Purpose
Consent	We may rely on your freely given consent at the time you provided your personal data.	To provide you with news, special offers, newsletters, and general information about goods and services which we offer (with your explicit consent).
Legitimate interests	We may rely on legitimate interests based on our evaluation that the processing is fair and reasonable.	To provide and maintain our Website, as well as to detect, prevent and address security threats.
		To analyse, improve, personalise and monitor the usage of our Website and communications.
Public interest	To meet regulatory and public interest obligations.	To maintain records in accordance with applicable regulation and legislation.

5 DATA STORAGE AND RETENTION

We retain your personal data only for as long as is necessary for the purposes set out in Section 3 of this Privacy Policy, and to the extent necessary to comply with our legal obligations, resolve potential disputes and enforce our legal agreements and policies.

6 SERVICE PROVIDERS AND DATA TRANSFERS

We may employ third party companies ("**Service Providers**") to facilitate the operation of our Website or perform related services, such as payment, delivery or IT infrastructure services. These third parties have access to your personal data only and insofar as necessary to perform these tasks on our behalf and are required to safeguard it in accordance with our contractual obligations and applicable data protection legislation.

Such safeguards may include transfer to countries that have been deemed to provide an adequate level of protection according to lists of countries published by the Federal Data Protection and Information Commissioner; applying standard data protection model clauses, binding corporate rules or other standard contractual obligations which provide for appropriate protection of data; with providers in the US, use of companies that use the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks.

7 DATA PROCESSORS AND DATA TRANSFERS

We may employ third party companies ("**Data Processors**") to provide the medical products and services we distribute, such as home-sampling test kits or sample analysis in a laboratory. We exchange personal data with these third parties only and insofar as necessary to perform these tasks and they are required to safeguard it in accordance with our contractual obligations and applicable data protection legislation.

Such safeguards may include transfer to countries that have been deemed to provide an adequate level of protection according to lists of countries published by the Federal Data Protection and Information Commissioner; applying standard data protection model clauses, binding corporate rules or other standard contractual obligations which provide for appropriate protection of data; with providers in the US, use of companies that use the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks.

8 DATA DISCLOSURE

We may disclose your personal data in the good faith belief that such action is necessary to:

- To comply with a legal obligation (i.e. if required by law or in response to valid requests by public authorities, such as a court or government agency);
- To protect the security of the Website and defend our rights or property;
- To prevent or investigate possible wrongdoing in connection with Health Yourself;
- To protect ourselves against legal liability.

9 DATA SECURITY

We take reasonable technical and organizational security measures that we deem appropriate in order to protect your stored data against manipulation, loss, or unauthorized third-party access. Our security measures are continually adapted to technological developments.

We also take internal data privacy very seriously. Our employees and the Service Providers that we retain are required to maintain secrecy and to comply with applicable data protection legislation. In addition, they are granted access to personal data only insofar as this is necessary for them to carry out their respective tasks or mandate.

The security of your personal data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security. We recommend that you use antivirus software, a firewall, and other similar software to protect your system.

10 DATA PROTECTION RIGHTS

You have the below data protection rights on the basis of the Swiss Federal Act on Data Protection. Please note that we may ask you to verify your identity before responding to such requests.

Right to access	You have a right to request a copy of your personal data, which we will provide to you in an electronic form.
Right to amendment	You have the right to ask us to correct our records if you believe they contain incorrect or incomplete information about you.
Right to withdraw consent	If you have provided your consent to the collection, processing and transfer of your personal data, you have the right to fully or partly withdraw your consent. This includes cases where you wish to opt out from marketing communications. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there is another legal basis for processing. To stop receiving emails from us, please click on the 'unsubscribe' link in the email you received from us.
Right to erasure	You have the right to request that we delete your personal data when it is no longer necessary for the purposes for which it was collected, or when it was unlawfully processed.

Right to restriction of processing	You have the right to request the restriction of our processing of your personal data where you believe it to be inaccurate, our processing is unlawful, or where we no longer need to process it for the initial purpose, but where we are not able to delete it due to a legal obligation or because you do not want us to delete it.
Right to portability	You have the right to request that we transmit your personal data to another data controller in a common format such as Excel, where this is data which you have provided to us and where we are processing it on the legal basis of your consent or in order to perform our contractual obligations (e.g. to send you products).
Right to object to processing	Where the legal basis for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have a compelling legal basis for the processing which overrides your interests, or if we need to continue to process the personal data for the exercise or defence of a legal claim.
Right to lodge a complaint with a supervisory authority	You have the right of appeal to a data protection supervisory authority if you believe that the processing of your personal data violates data protection law. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (www.edoeb.admin.ch/edoeb/en/home.html).

11 LINKS TO THIRD-PARTY APPS AND SITES

Our Website may contain links to sites or apps that are not operated by us. If you click a third-party link, you will be directed to that third party's site or app. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

12 COOKIE POLICY

We use the following third-party cookies on our Website:

Cookie	Type	Qualification	Function
WebsitePolicies	Cookie bar	Technical	We ask you for permission to set cookies and we store that permission.
Google Analytics	Analytics	Technical	We collect anonymous usage data of the website. These help us monitor usage and to identify where we need to make improvements.
Google Ads	Sales attribution	Marketing	Google collects data on clicks and conversions as a result from ads on their platforms. We use their services to increase our sales.
Freshchat	Chat	Functional	Freshchat provides the chat solution to get in touch with our service team.
Trustpilot	Rating & review	Marketing	We rely on Trustpilot for requesting unbiased reviews and ratings from our customers.

In case of need, we also use the following cookies on our Website:

Cookie	Type	Qualification	Function
Facebook	Sales attribution	Marketing	Facebook collects data on clicks and conversions as a result from ads on their platforms. We use their services for advertising campaigns.

Hotjar	Analytics	Technical	We collect anonymous usage data of the website. These help us monitor usage and to identify where we need to make improvements.
Unbounce	Landing pages	Marketing	We use Unbounce to create landing pages for advertising campaigns.

13 CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We therefore encourage you to review this Privacy Policy periodically for any changes.

Changes to this Privacy Policy are effective when they are posted on this page.

14 CONTACT US

If you have any questions about this Privacy Policy, please contact us at: privacy@yourself.health, or write to:

Health Yourself AG
Langstrasse 62
8004 Zürich