

HALO™ APP PRIVACY POLICY

1. Introduction

This Privacy Policy explains how and why any personal information relating to you that you provide to us or that we obtain (“**Data**”) will be used and disclosed by us in connection with your use of our HALO™ application (“**App**”) and the HALO™ Service. Please read this Privacy Policy carefully.

2. About us

The App and the HALO™ Service are provided by Volta Technologies Limited, registered in England and Wales, no. 12612284 (referred to in this Privacy Policy as “**us**”, “**our**” or “**we**”). Our contact details are given below (Section 12 - Further Information).

For the purposes of the applicable UK Data Protection Legislation (which includes the EU General Data Protection Regulation, known as the “**GDPR**”, and the UK Data Protection Act 2018), we are the controller of your Data (that is, the person responsible for deciding how to hold and use your Data), and you are the data subject.

You must be 18 years or older to download the App and use the HALO™ Service.

3. The Service

The App enables us to provide you with access to the HALO™ Service, the world's most effective screening solution for infectious diseases, including COVID-19 (“**HALO™ Service**”). General information about the HALO™ Service can be found on our website at www.haloverify.com (“**Site**”). Further details of how to access, download and register with the App, and how the Service will be delivered, will be confirmed to you by the company or other entity for which we provide the HALO™ Service and by whom you employed or engaged (“**Service Participant**”).

When you download and register with the App, you will be asked to give your consent to use the HALO™ Service, and to confirm that you are aware of the collection, use and transfer of your Data under the terms of this Privacy Policy and our Terms of Use.

The HALO™ Service involves us providing you with a testing kit, analysing the sample that you provide once you return it to our testing facility, and providing you with the results of the testing (“**Results**”) once your sample has been analysed.

Further details of how the HALO™ Service works will be given to you, either by us or by the Service Participant, when you register with the App.

Please note that nothing in the App, the Site or the HALO™ Service constitutes the offer or provision of medical advice or treatment.

4. Data we collect and how we use it

When you register with the App, we ask you to provide details of:

- your full name;
- your date of birth;
- your phone/mobile phone contact number.

In some cases, we also ask you to provide further means of identification such as:

- your home address and/or other current residential address, including postcode;
- your e-mail address;
- your occupation (if relevant);
- your work/education address (if relevant);

- [passport details];
- [a profile photo].

The legal basis on which we collect this information is that it is necessary to enable us to provide the Service, and also to comply with our legal obligations.

We will ask you to confirm that all information about yourself that you give us is true, complete and accurate. If any of your Data changes while you are using the Service, you may edit your earlier responses in the "my account" section of the mobile app, or inform us at info@haloverify.com.

We will also store information that your Device provides to us in connection with your use of the App, such as your type of Device, browser type, and its unique identifiers, operating system, IP address, network information and requested and referring URLs. The legal basis on which we collect this information is that it is necessary to enable us to maintain the App and to provide the Service, and also necessary for our legitimate interest in maintaining and improving the functionality of the App.

5. How we use your Data

We will use the Data primarily to provide you with the App functionality and the HALO™ Service, on the legal basis that it is necessary for the provision of the HALO™ Service.

We may also use the Data to:

- improve the quality and content of the App;
- notify you about important functionality changes and alterations to the App and/or the HALO™ Service (including material changes to this Privacy Policy and/or the Terms of Use); and
- provide you with support and information about the App and/or the HALO™ Service.

We will do so on the basis that it is necessary for our legitimate interests in providing the App and the HALO™ Service, and maintaining and improving their functionality.

5. Who we share your Data with

Your Data will be kept anonymous when the sample that you provide is sent to our testing facility.

When you register for the HALO™ Service, you will be given the option to:

- share the Results (including the Results of any previous testing) with the Service Participant, or
- share only the latest Results with the Service Participant, or
- not share the Results (or the latest Results) with the Service Participant.

If you later wish to change the option you have chosen, you can do so at any time by using the "my account" section of the App or by contacting us at info@haloverify.com.

We will only share the Results with the Service Participant on the legal basis that you have consented to our doing so.

We may also disclose your Data:

- if we are under a duty to do so in order to comply with any legal or regulatory obligation or request, on the legal basis that it is necessary to enable us to comply with our legal obligations; or
- in order to enforce or apply this Privacy Policy or our Terms of Use, to investigate potential breaches, or to protect the rights, property or safety of us, other users, or others, on the

legal basis that it is necessary for our legitimate interests to do so. This may include exchanging information with other companies and organisations for the purposes of legal advice and enforcement.

Please note that we are required by UK law to notify all Results, whether positive or negative, together with the personal identifying details, to Public Health England (you can obtain further information at <https://www.gov.uk/government/organisations/public-health-england>).

If we reorganise our group of companies so that we need to transfer your Data to another group company, or if another company acquires us or all or substantially all of our assets, we will transfer your Data on the legal basis that it is necessary for our legitimate interests to do so, and that other company will possess the same information and will assume the rights and obligations with respect to that information as described in this Privacy Policy.

Except as set out above, we will never sell, distribute or disclose any of your Data (except anonymised aggregate information) with any third party without your express consent.

7. Where we store your data

We store all Data with third party service providers who provide adequate guarantees of technological and other means of protection.

Our service providers may be based in countries outside the European Economic Area whose laws provide for a different standard of protection for your personal data than that provided under UK law. In these cases, we will ensure that they have provided adequate means of protection in accordance with the applicable Data Protection Legislation, such as by means of the European Union's standard contractual clauses for transfers of personal data outside the European Economic Area.

We follow generally accepted industry standards to protect the Data we collect or produce in connection with the HALO™ Service. However, no method of transmission over the internet or via a Device is totally secure. We will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with this Privacy Policy, but we cannot take responsibility for any unauthorised access or loss of personal information that is beyond our control.

8. Cookies

The HALO™ App uses cookies to distinguish you from other users of the App, and to help us provide you with a good experience when you use the App. Further details can be seen on our Cookies policy.

9. How long do we keep your personal information?

We will retain your personal data for up to 8 years, in accordance with the Records Management Code of Practice for Health and Social Care 2016, but will dispose of your data sooner if it is appropriate to do so. If you live in Wales, Scotland or Northern Ireland, different country-specific provisions apply on retention of records (see the links on the UK Government notice at <https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information/testing-for-coronavirus-privacy-information-quick-read>).

At the end of the periods indicated above, it may not be possible in certain cases to physically delete the data (for instance, where it is stored on a secure external server), in which case we will take appropriate steps to ensure that it is not available for re-use or disclosure to third parties.

10. Your rights as a data subject

As a data subject you have certain rights including:

- the right to access the information held about you;
- the right to ask us not to process your personal data for marketing purposes;
- the right to ask us to rectify inaccurate personal data about you;
- the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit the data to another controller without hindrance (data portability);
- the right to ask for the restriction of personal data concerning yourself that is inaccurate, unlawfully processed, or no longer required;
- the right to ask for the erasure of personal data concerning yourself where processing is no longer necessary, or the legitimate interests we have in processing your data are overridden by your interests, rights and freedoms as the data subject;
- where the processing of your personal data is based on a consent you have given, the right to withdraw that consent at any time; and
- the right to make a complaint to the supervisory authority (the UK Information Commissioner's Office, at <https://ico.org.uk/>, where you can find further information about your rights as a data subject).

11. Changes to Privacy Policy & Future developments

We may revise this Privacy Policy from time to time. The most current version of this Privacy Policy will govern our use of information about you and will be located on this page. If we make material changes to this Privacy Policy, then where appropriate we will notify you by email or by posting a notice on the App and/or the Site prior to the effective date of the changes. By continuing to access the App after those changes become effective, you agree to be bound by the revised Privacy Policy.

12. Further information

If you have any questions or requests regarding our use of your Data, please contact us by email to: info@haloverify.com

or you can contact us by phone: +44 203 3991 9743

or by post to:

Volta Technologies Limited, 17 Carlton House Terrace, London SW1Y 5AS, England.

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