



PRINCIPLES OF PROCESSING CUSTOMERS' PERSONAL DATA

of the company Mumo Health j. s. a.

Version 1.0

Effective date: 1 June 2024

1. INTRODUCTION

This Personal Data Processing Policy applies to the processing of personal data of customers of Mumo Health j. s. a. ("**Trader**"), potential customers of the Trader, and visitors to websites and applications operated by the Trader.

The purpose of this personal data processing policy is also to provide data subjects with information the manner in which the Trader processes personal data in the performance of its activities.

The Trader undertakes to protect personal data in accordance with the applicable generally binding legal regulations in the field of personal data protection so as to ensure the protection of the fundamental rights and freedoms of persons whose personal data the Trader processes.

Privacy is an ongoing process and the information in this policy is subject to change. Trader reserves the right to change this policy at any time.

2. DEFINITIONS AND INTERPRETATION

Capitalized words and words appearing in Annex 1 shall have the meanings ascribed to them in this document according to Annex 1.

Unless otherwise stated, a reference to a paragraph or article is a reference to a paragraph or article of this Privacy Policy.

3. OPERATOR

The personal data operator under this privacy policy is the Trader.

Contact details to address any queries relating to the processing of personal data by the Trader are the following:

Email: info@mumo.health

Address: Mumo Health j. s. a.
Senica 2
811 04 Bratislava
Slovak Republic

4. PERSONAL DATA

4.1 Categories of personal data

The Trader processes the following categories of personal data, depending on the type and extent of the interaction between the data subject and the Trader (see Article 5):

Delivery details	This category includes in particular the billing address, delivery address, telephone number, and email address.
Identification data associated with the account	This category includes, in particular, the first and last name, username or similar identifier associated with the Customer's account on the Platform, Customer Account ID.
Identification data	This category mainly includes first name, last name, email address and phone number.
Marketing data	This category mainly includes the customer's email address and preferences on the subscription of marketing information.
Technical data	This category includes <i>cookies</i> , URLs of pages visited by the data subject prior to visiting the Website or the Web App, time and date of visits, browsing habits while browsing the Website and the Web App and Mobile App, IP address, geographic location of the visitor, browser type and name, type of operating system of the device through which the Customer accessed the Website and the Web App, how and when the Website, Web App and Mobile App were used, and other similar technical and analytical information.
Data Linked to the Order	This category includes, in particular, the contents of the Order, data related to the payment of payments under the Order, the status of the Order, the history of Orders, data related to the complaint of Products, data related to the withdrawal from the Contract, data related to communication with the Trader's customer service.
Results of analyses	This category includes the results of analyses performed as part of the Testing Services.
Basic health data	This category includes selected health information necessary for the correct interpretation of the Analysis Results, in particular data related to age, weight, height, lifestyle, and the like.

4.2 Method of obtaining personal data

The Trader collects the personal data of the data subjects:

- (a) directly from the data subject (for example, when filling in the registration form when setting up an account Customer on the Platform or when entering the Order data);
- (b) automatically when the data subject interacts with the Trader's services (for example, when visiting Web site).

4.3 Consequences of failure to provide personal data

Failure to provide details may result in an inability to deliver the Goods and/or provide the Testing Services.

4.4 Minors

Trader's products are not accessible to persons under the age of 18 and Trader does not knowingly process personal data of persons under the age of 18.

5. THE PURPOSE AND LEGAL BASIS OF THE PROCESSING

This Article 5 contains information on the personal data processed, broken down by the individual interactions of the data subject and the Trader that occur when using the services provided by the Trader. This Article 5 contains information on:

- (a) the purpose of the processing;
- (b) the categories of data subjects whose personal data are processed by the Trader in the context of each type of interaction between the data subject and the Trader;
- (c) the categories of personal data processed by the Trader in such interaction;
- (d) the legal basis for the processing.

5.2 Create an account

- (a) Purpose of processing:
Creation of the Customer's account.
- (b) Categories of data subjects whose personal data is processed by the Trader: Persons who have created an account on the Platform.
- (c) Categories of personal data processed by the Trader:
 - i) Identification data associated with the account;
 - ii) Technical data;
 - iii) Basic health data.
- (d) Legal basis for processing:
 - i) To take pre-contractual measures at the request of the data subject (Article 6(1)(b) GDPR);
 - ii) In the scope of the processing of Essential Health Data, the consent of the data subject (Article 9(2)(a) GDPR).

5.3 Provision of Testing Services

- (a) Purpose of processing
Performance of the Contract, the subject of which is the provision of Testing Services.
- (b) Categories of data subjects whose personal data are processed by the Trader:
Persons who have placed an Order for the supply of Testing Services.
- (c) Categories of personal data processed by the Trader:
 - i) Delivery details;
 - ii) Identification data;
 - iii) Technical data;
 - iv) Data associated with the Order;
 - v) Results of analyses;
 - vi) Basic health data.
- (d) Legal basis for processing:
 - i) the performance of a contract to which the data subject is a party (Article 6(1)(b) GDPR);
 - ii) compliance with a legal obligation (Article 6(1)(c) GDPR);
 - iii) in the scope of processing of the Basic Health Data and the Results of the analyses, the consent of the data subject persons (Article 9(2)(a) GDPR).

5.4 Purchase of Goods

- (a) Purpose of processing
Performance of the Contract, the subject of which is the delivery of the Goods. The provision of data is necessary for the conclusion of the Contract.

- (b) Categories of data subjects whose personal data are processed by the Trader: persons who have sent an Order, the subject of which is the delivery of Goods.
- (c) Categories of personal data processed by the Trader:
 - i) Delivery details;
 - ii) Identification data;
 - iii) Technical data;
 - iv) Data associated with the Order.
- (d) Legal basis for processing:
 - i) the performance of a contract to which the data subject is a party (Article 6(1)(b) GDPR);
 - ii) compliance with a legal obligation (Article 6(1)(c) GDPR).

5.5 Complaints, complaints, and customer support

- (a) Purpose of processing
Performance of the Contract, performance of the Trader's obligations under generally binding legislation.
- (b) Categories of data subjects whose personal data are processed by the Trader:
Customers who make c l a i m s , lodge complaints or exercise other rights under the General Terms and Conditions or generally applicable law.
- (c) The categories of personal data that the Trader may process, depending on the content of the interaction with the data subject:
 - i) Identification data;
 - ii) Delivery details;
 - iii) Technical data;
 - iv) Data necessary for the performance of the contract;
 - v) The data associated with the order;
 - vi) Results of analyses;
 - vii) Basic health data.
- (d) The legal basis for processing, depending on the content of the interaction with the data subject:
 - i) the performance of a contract to which the data subject is a party (Article 6(1)(b) GDPR);
 - ii) compliance with a legal obligation (Article 6(1)(c) GDPR);
 - iii) the legitimate interest of the Trader in ensuring the satisfaction of its customers (Article 6(1)(f) GDPR);
 - iv) in the scope of processing of the Basic Health Data and the Results of the analyses, the consent of the data subject persons (Article 9(2)(a) GDPR).

5.6 Visiting websites and using Trader applications

- (a) Purpose of processing:
Monitoring the use of the Trader's sites and applications for the purpose of performance monitoring, security, and *user experience* improvements.
- (b) Categories of data subjects whose personal data are processed by the Trader:
Visitors to the Website and users of the Web App and Mobile App.
- (c) Categories of personal data processed by the Trader:
technical data.
- (d) Legal basis for processing:
 - i) Trader's legitimate interest in ensuring security, functionality and enhancements the websites it operates (Article 6(1)(f) of the GDPR);
 - ii) In relation to non-essential *cookies*, the visitor's consent (Article 6(1)(a) GDPR).

5.7 Legal agenda

- (a) Purpose of processing:
Proving, asserting and defending the Trader's legal claims.
- (b) Categories of data subjects whose personal data are processed by the Trader: the Trader's customers.
- (c) Categories of personal data that the Trader may process, depending on the content of the interaction with
by the person concerned:
 - i) Identification data;
 - ii) Delivery details;
 - iii) Technical data;
 - iv) Data necessary for the performance of the contract;
 - v) The data associated with the order;
 - vi) Results of analyses;
 - vii) Basic health data.
- (d) Legal basis for processing:
 - i) The legitimate interest of the Trader in exercising his rights (Article 6(1)(f) GDPR).

5.8 Direct targeted marketing and newsletter

- (a) Purpose of processing:
Marketing, advertising and collecting feedback about the Trader's services.
- (b) Categories of data subjects whose personal data are processed by the Trader:
Persons who have consented to receive targeted marketing messages and/or newsletters.
- (c) Categories of personal data processed by the Trader:
 - i) Marketing data;
 - ii) Technical data.
 - iii) Data associated with the Order;
 - iv) Results of analyses;
 - v) Basic health data.
- (d) Legal basis for processing:
 - i) Consent of the data subject (Article 6(1)(a) GDPR).
 - ii) Consent of the data subject (Article (9(2)(a) GDPR).

6. RECIPIENTS OF PERSONAL DATA

6.1 Categories of recipients of personal data

In the course of its activities, the Trader may disclose personal data to third parties for the purpose of ensuring the delivery of Products and other services provided by the Trader (e.g. operation of the Online Shop, Website and Web Application). In particular, the following persons may have access to personal data:

- (a) to the extent and in connection with the performance of the analyses and delivery of the Results, the Laboratory Service Provider,
- (b) to the extent and in connection with arranging for delivery of the Goods and Test Kits to the Customer, logistics service provider (*fulfilment partner*);
- (c) to the extent and in connection with the delivery of the Sample to the laboratory service provider, the logistics service provider (*fulfilment partner*);
- (d) to the extent in connection with arranging the transportation of the Goods, Test Kits and Samples, transport service provider;

- (e) to the extent and in connection with activities relating to or carried out through the Website, the Web App and the Mobile App, IT service providers and IT infrastructure;
- (f) to the extent necessary for the fulfilment of tax and accounting obligations, service providers in the tax and accounting area;
- (g) to the extent and in connection with the provision of payments related to the Order, the payment services providers;
- (h) within the scope of the interpretation of the Results, consultants in medicine and natural sciences;
- (i) to the extent related to the handling of disputes, complaints and other Customer complaints, the legal services providers;
- (j) to the extent and in connection with the performance of marketing, consultants and other marketing services providers.

6.2 List of beneficiaries

A detailed list of the recipients of the personal data of the data subjects will be provided by the Trader upon request of the person concerned.

7. TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES

The Trader transfers personal data to countries outside the EEA only if such transfers cannot be avoided due to the unavailability of services necessary for the performance of the Trader's activities in the EEA. In doing so, the Trader shall always ensure that adequate safeguards are in place under applicable generally applicable law so as to provide a level of data protection equivalent to the protection of personal data in the EEA.

8. RETENTION PERIOD

The Trader shall retain the personal data for a period reasonably necessary to fulfil the purposes for which the Trader has collected it and to comply with the requirements under generally applicable law.

The Trader may keep personal data longer in case of claims and complaints or if the Trader reasonably believes that there is a possibility of litigation.

To determine the appropriate retention period for personal data, the Trader shall consider in particular the nature and sensitivity of the personal data, the potential harm caused by the unauthorised use or disclosure of the personal data, and the purposes for which the personal data is processed.

Personal data recorded on the Trader's periodic backups made in accordance with the Trader's normal practice, which are accessible only to authorized administrators of the Trader's information systems, may be retained for the duration of the Trader's existence. Personal data may also be retained for longer if required by generally applicable law.

9. SECURITY MEASURES

In order to protect personal data, the Trader implements a wide range of security measures, in particular the following measures:

- (a) Special measure regarding the handling of the Samples and regarding the Results of the Analyses:
 - i) Samples are pseudonymized through a unique Test Kit code in such a way that only the Trader can associate the Sample and the Analysis Results with a specific individual.
- (b) In relation to the facilities on which the personal data of the data subject are stored:
 - i) Control physical access to the equipment;
 - ii) Firewall;
 - iii) Password protection;
 - iv) Ongoing updates and testing of security technology;
 - v) Use of certified security technologies.
- (c) Organisational arrangements:

- i) Cooperation with verified suppliers;
- ii) Allowing access to personal data only to those who need the information to know in order for the Trader to be able to deliver the performance under the Contract;
- iii) Training of Trader's employees on the importance of confidentiality and maintaining the privacy and security of personal information;
- (d) Contractual arrangements:
 - i) Data recipients are bound by contractual or legal obligations of confidentiality.

10. RIGHTS OF DATA SUBJECTS

10.1 General rights

Data subjects have the following rights in relation to the processing of their data:

- (a) Right to information: this right provides the data subject with the possibility to request information from the Trader about what personal data is being processed and the reasons for such processing.
- (b) Right of access: this right provides the data subject with the possibility to obtain access to his or her personal data that are being processed. This right gives data subjects the right to see their own personal data as well as the right to request copies of personal data.
- (c) Right to rectification: this right provides the data subject with the possibility to request the rectification of his or her personal data if the data subject considers that the personal data are not up-to-date or accurate.
- (d) Right to object: This right provides the data subject with the possibility to object to processing her personal data.
- (e) Right to object to automated processing: this right provides the data subject with the possibility to object to a decision based on automated processing. With this right, the data subject can, for example, request that the request be considered on an individual basis because he or she considers that the automated processing may not take into account the unique situation of the data subject.
- (f) Right to erasure (right to be forgotten): This right provides the data subject with the possibility to request the erasure of his or her data. This will generally apply in particular to situations where the relationship with the data subject has ended. This right is not absolute and depends on the retention schedule and the retention period in accordance with other applicable generally applicable law.
- (g) Right to data portability: this right provides the data subject with the possibility to request the transfer of his or her personal data. As part of such a request, the data subject may ask for his or her personal data to be provided back to him or her or to be transferred to another controller. In doing so, the personal data must be provided or transferred in a machine-readable electronic format.

Relevant generally applicable laws (in particular the GDPR and any national laws) and directives provide clarification on the scope and conditions under which these rights can be exercised.

The trader may refuse to exercise the data subject's rights if the data subject exercises them in a manifestly abusive manner (in particular, manifestly unreasonably, repeatedly or vexatiously).

10.2 Right to withdraw consent

Where the processing of personal data is based on consent pursuant to Article 6(1)(a) GDPR or Article 9(2)(a) GDPR (see Article 5), the data subject shall have the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent given prior to its withdrawal.

10.3 Right to lodge a complaint

Data subjects may lodge a complaint about the treatment of their data with the supervisory authority responsible for the enforcement of data protection law. A list of European Union supervisory authorities is available at http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

11. AUTOMATED DECISION MAKING

The trader does not carry out automated decision-making in the processing of personal data.

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[FOLLOW ATTACHMENTS]

ANNEX 1 DEFINITIONS

the person concerned	Meaning according to Article 4 GDPR
Delivery details	Meaning according to Article 4
EHS	European Economic Area
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data
Identification data	Meaning according to Article 4
Identification data associated with the account	Meaning according to Article 4
Marketing data	Meaning according to Article 4
Trader	Mumo Health j. s. a., a company governed by the law of the Slovak Republic, with its registered office at Senická 2, 811 04 Bratislava, Slovak Republic, ID No. 55 714315, registered in the Commercial Register of the Municipal Court of Bratislava III, Section Sja, Insert No. 297/B
Order	Meaning according to the general terms and conditions of the Trader
personal data	Meaning according to Article 4 GDPR
Platform	Meaning according to the general terms and conditions of the Trader
operator	Meaning according to Article 4 GDPR
Recipient	Meaning according to Article 4 GDPR
Processing	Meaning according to Article 4 GDPR
Technical data	Meaning according to Article 4
Testing services	Meaning according to the general terms and conditions of the Trader
Goods	Meaning according to the general terms and conditions of the Trader
Data Linked to Order	Meaning according to Article 4
Results of analyses	Meaning according to Article 4
Web application	Meaning according to the general terms and conditions of the Trader
Basic health data	Meaning according to Article 4

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