

Data Privacy Policy



Global System

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Company Sensitive and Proprietary

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1. THIRD PARTY PRIVACY POLICY

At InteliWell, we are committed to protecting and respecting your privacy.

This Privacy Policy and Data Privacy Notice, together ("Policy") explains what personal information is collected about you by InteliWell JV GP Limited and the purposes for which such information is used. In this Policy, we describe our information practices with respect to the InteliWell website inteliwell.com, hereinafter referred to as ("Site"). Where we refer to **"InteliWell," "InteliWell general partnership," "company," "we," "us" or "our"** in this Privacy Policy, we are referring to the "data controller," or InteliWell JV GP Limited.

2. APPLICATION OF THIS POLICY

This Policy covers third parties that visit our website, we do business with, may do business with or are in some other way connected to our business. This includes suppliers, sub-contractors, contingent, temporary, or contract workers, consultants, professional advisors, interns, visitors to our offices, customers, and investors.

The terms of this Policy may also be supplemented by any other privacy notice or statement we may provide on specific occasions when we are collecting or processing personal information about you.

3. WHAT DOES THIS POLICY COVER?

This Policy explains how we collect, use, store, transfer and secure the personal information of the third parties we do business with, as outlined above. This Policy also serves as a privacy notice as required by some laws.

You should read this Policy so you know what we are doing with your personal information or the personal information you might provide on behalf of someone else. Where you give us personal information about another person, in doing so you confirm you have the lawful basis to provide the personal information and have brought this Policy to their attention, including obtaining their explicit consent where necessary.

4. PROCESSING THE PERSONAL INFORMATION OF CHILDREN

We do not intentionally collect the personal information of individuals under 13 years of age. If you wish to contact InteliWell in a way which requires you to submit your personal information, please get your parent or guardian to do so on your behalf.

5. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

You directly provide InteliWell with most of the personal information we collect but we may also obtain your personal information from:

- Internal sources as a result of your interactions with us;
- Through your activity and interactions on our web page; and
- Publicly available resources such as the internet and social networking sites such as LinkedIn.

6. WHAT PERSONAL INFORMATION DO WE PROCESS ABOUT YOU?

The type of personal information we may collect about you generally falls into the categories below. Note that the following list of examples is non-exclusive:

- **Business Development, Business Contact and Other Information:** including name, business address, email address, job title, marital and family status, and other information related to you and your current or potential work with us.
- **Information you post on our Site:** Information made public through a post or comment you make on our Site. Once you provide such information, it is in the public sphere and therefore no longer considered personal information.
- **ISP information and Cookies:** See below on how we collect information through your use of our Site.

7. ISP INFORMATION & COOKIES

Our web server may collect basic user information about our site viewers that includes an ISP's domain, the date and time our website was accessed, the areas or pages of the Site that you visit, the amount of time you spend using the Site, the number of times you return, and other Site usage data data regarding network connected hardware, your browser type, operating system, and the type of device you used to access our website. We may also use small text files called "cookies" to track user sessions and page views. If we collect any basic user information or use cookies for our website viewers, we do so, to analyze our web traffic, to provide advertisements relevant to you, and to help regulate usage or tailor our site to our viewers' needs and preferences. Some information about your use of the Site and certain third-party services may be collected using cookies or google analytics across time and services, and used by us and third parties for purposes such as to associate different devices you use, and deliver relevant ads and/or other content to you on our services and certain third-party services. See below regarding certain choices you may have regarding these activities.

8. HOW DO I REJECT OR DELETE COOKIES?

You can change your preferences for the Site and/or the websites of any third party suppliers by changing your browser settings. Please note that most browsers automatically accept cookies. Therefore, if you do not wish cookies to be used, you may need to actively delete or block the cookies. If you reject the use of cookies, you will still be able to visit our websites but, some of

the functions may not work correctly. You may also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. By using our website without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not deleted or rejected on your device.

9. WHY DO WE PROCESS YOUR PERSONAL INFORMATION?

We rely on one or more of the following lawful grounds for processing your personal information. These grounds may vary by jurisdiction.

- Where we need to perform a contract, we have with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests. In general terms, we rely on this basis for processing your personal information in the normal course of our business operations, to interact with you in the course of those operations and to manage our business operations in the most effective way.
- With your explicit consent, where required, and which, subject to applicable local law, you have the right to withdraw at any time.

On a day-to-day basis, the purposes for which we will process your personal information will include (as appropriate to our relationship with you):

- To develop a business relationship with you through direct marketing;
- To fulfill requests and obligations related to that business relationship;
- To manage the business relationship with you and to understand your needs and how they may be met;
- To fulfill our legal functions and obligations and to protect our rights and defend any claims made against us.

We **will not** use your personal information for:

- Automated decision making. This means there is some human involvement in making decisions that could have a legal or similarly significant effect on you.

We will not intentionally collect or process Special Category personal information about you.

10. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We are committed to protecting your personal information. As such, we have in place various security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed.

We also limit access to your personal information to those who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with suspected personal information breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. WHO WILL WE SHARE YOUR PERSONAL INFORMATION WITH?

From time to time, we may need to share the personal information we process with others with your explicit consent, where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Where we engage third-party service providers, your personal information is exclusively processed for the purposes above and only shared on a strict business need to know basis. Before we disclose any information, we will ensure there are appropriate security standards in place to protect your personal information. With your explicit consent, we may allow our third-party service providers to use your personal information, only when anonymized or in aggregated form for their own purposes.

We may disclose your personal information to the following categories of recipients:

- Other companies within InteliWell JV GP Limited.
- Authorized third party service providers, contractors, agents, professional advisors (including without limitation) external auditors, tax, and legal consultants.
- To any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary to comply with a legal obligation or as is permitted by local law.
- To any person to whom InteliWell proposes to transfer any of its rights or duties or in the context of a possible sale or restructuring of the business.
- With your consent, to third parties who may sell you ancillary or competing services;
- To other third parties as directed by you. Where those recipients are controllers in respect of your personal information, they will process your personal information for the purposes set out in their own notices and are directly responsible to you for their use of your personal information.

12. TRANSFERS OF YOUR PERSONAL INFORMATION TO OTHER COUNTRIES

Due to the multinational character of InteliWell, we may transfer, and process, your personal information within the InteliWell general partnership or to authorized third parties outside of your country. Where this is the case, we have taken appropriate safeguards to ensure that your personal information will remain protected when transferring personal information by implementing technical and organizational security measures and using the standard contractual clauses approved by the competent authority, such as the European Commission, which contractually ensure the protection of your personal information, supplemented (where necessary) by appropriate additional safeguard measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects applicable data protection law.

If you require further information about any these safeguards, you can request it from: inteliwell.inquiry@inteliwell.com

13. HOW LONG DO WE HOLD YOUR PERSONAL INFORMATION?

We will keep your personal information for only as long as is necessary to fulfill the purposes for which we collected it, or when you withdrawal your consent, whichever is sooner. We may keep it longer to satisfy any legal, accounting or reporting requirements.

To determine how long to keep personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

14. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

We would like to make sure you are fully aware of your data protection rights. To the extent provided by law in your jurisdiction, you may be entitled to the following:

- **The right to access** – means the right to request copies of your personal information and to check that we are lawfully processing it.
- **The right to rectification** – means the right to request that we correct any information you believe is inaccurate. This also includes the right to request for us to complete any information you believe is incomplete.
- **The right to erasure** – means the right to request that we erase or anonymize your personal information, under certain conditions.
- **The right to restrict processing** – means the right to request that we restrict the processing of your personal information, under certain conditions.
- **The right to object to processing** – means the right to object to our company’s processing of your personal information, under certain conditions.
- **The right to information about automated decision making** – means the right to request information about the criteria and the procedures used in any automated decision making that affects your interests.
- **The right to information about consent** – means the right to withdrawal your consent, and to request information about the possibility of denying consent and the consequences of such denial.
- **The right to information about third parties with whom we share your personal information** – means the right to request information about the public and private entities with whom we shared your personal information.
- **The right to data portability** – means the right to request that we transfer the personal information that we have collected to another organization, or directly to you, under certain conditions.
- **The right to Opt-Out** — means the right of consumers in California to opt-out of the sale of information to third parties.

Where you have provided us with your consent to process personal information, you have the right to withdraw such consent at any time and you can do that by emailing inteliwell.inquiry@inteliwell.com

We will respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. If you would like to exercise any of these rights, please contact us at our email: inteliwell.inquiry@inteliwell.com

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

15. SPECIAL INFORMATION FOR CALIFORNIA RESIDENTS

We do not share personal information as defined by California Civil Code Section 1798.83 (“Shine the Light law”) with third parties for their direct marketing purposes absent your consent. To opt-out of future sharing with third parties for their direct marketing purposes, contact us at inteliwell.inquiry@inteliwell.com. If you are a California resident, you may request information about our compliance with the Shine the Light law by contacting us at inteliwell.inquiry@inteliwell.com. Any such request must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and postal code. Please note that we are only required to respond to one request per customer each year.

California residents also may exercise the following rights under the California Consumer Privacy Act (CCPA):

- Up to two times each year, you may request that we disclose to you the categories and specific pieces of personal information that we have collected about you, the categories of sources from which your personal information is collected, the business or commercial purpose for collecting your personal information, the categories of personal information that we disclosed for a business purpose, the categories of third parties with whom we have shared your personal information, any categories of personal information about you that we sold, and the business or commercial purpose for selling your personal information, if applicable.
- You may request that we delete personal information that we have collected from you, subject to certain exceptions.

To exercise your rights, you can contact us at inteliwell.inquiry@inteliwell.com. If you exercise any of your rights, we will not discriminate against you, such as by denying you access to our services or restricting your access to products or services of a certain price or quality.

For purposes of compliance with the CCPA, we make the following disclosures:

- We collect the following categories of personal information: Identifiers, personal information described in Cal. Civ. Code 1798.80, internet or other electronic network activity information, characteristics of protected classifications under California or federal law, commercial information, and inferences drawn from the preceding categories of personal information.

- We disclose the following categories of personal information for a business purpose: Identifiers, personal information described in Cal. Civ. Code 1798.80, internet, or other electronic network activity information.

We do not sell your personal information.

16.CHANGES TO THIS POLICY

Our company keeps its Policy under regular review and places any updates on this web page. To stay up to date on the most recent changes, make sure to revisit this page periodically. This Privacy Policy was last updated on 14th April 2022.

17. HOW TO CONTACT US

InteliWell is committed to protecting your personal information in accordance with this Policy and applicable data privacy laws.

If you have any questions about this Policy, the personal information we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to email us at: inteliwell.inquiry@inteliwell.com

You may also lodge a complaint with the relevant data protection authority in your country if you consider that the processing of your personal information infringes applicable data privacy and protection laws but we would ask that where possible, or where required by law, you contact us first to allow us an opportunity to discuss your concerns and try to resolve any issues before you make a formal complaint to a relevant authority.