

Menwell Ltd - Privacy Notice

THIS NOTICE INCLUDES THE FOLLOWING BRANDS:- MANUAL, VOY, OPTIMALE, MENOPAUSE CARE AND THINK CBT

We are committed to becoming the go-to global platform for online health and wellbeing. Through our websites (collectively referred to as “Sites”), we provide people with easy access to advice, medical support, and treatment options to help them make informed and proactive decisions about their health.

We understand that lengthy legal documents are no fun. However, we ask that you read this Privacy Notice (“Notice”) carefully as it contains important information, including who we are, how and why we collect, store, use, and share personal information, your rights in relation to your personal information, and how to contact us or the supervisory authority in the event you have a complaint.

We have designed this policy to be as user-friendly as possible.

1. What does this Privacy Notice cover?

This Notice covers any personal information we might collect from you or which we have obtained about you from a third party:

1. When you use our Site or App;
2. When you register an account with us;
3. When you purchase our products or services;
4. When you interact with our social media channels;
5. When you provide feedback, take part in market research or user testing, or provide customer testimonials;
6. Where you provide services to us as a Supplier;
7. Where you have requested to receive information about our products and services.

Our Site, products, and services are not intended for individuals under the age of 18, and we do not knowingly collect data relating to children.

If you do not agree with the contents of this Notice, you should not sign up for an account, purchase products or services, or otherwise submit information to us.

2. Who collects information about you?

This Privacy Notice applies to Menwell Limited and its associated UK group companies, which include the following:

- Optimale Limited
- CJA Balance Limited

- Menopause Care Limited
- Think CBT Limited
- Vitalia Clinic Group Limited
- H3 Health Limited
- MWN Services Limited

When we refer to “we,” “our,” “us,” or “the Company” in this Notice, we mean Menwell Limited (company number 11476975) and the subsidiaries listed above, operating under various brand names (including “MANUAL”, “Voy”, “Optimale”, “Menopause Care” and “Think CBT”).

The specific entity or brand you enter into a contract with will be the controller of your personal information. This Privacy Notice applies to that entity. For details of how to get in touch, please see the “Contact Us” Section of this Notice.

3. Useful Terms

In this Privacy Notice:

- “Customer” means individuals who register an account on the Site who may or may not purchase products or services from us.
- “Website Visitors” means individuals who visit our Site. Website Visitors may include Customers.
- “Suppliers” means those external vendors and suppliers that provide products and/or services to us.
- “Personal information” or “personal data” means any information about an individual from which that person can be directly or indirectly identified. It does not include data where the identity has been removed (i.e., anonymous data).

4. What personal information do we collect?

We may collect, use, store, and transfer different kinds of personal information about you which we have grouped together as follows:

Data Type	Description
Identity Data	First name, last name, username, password, date of birth, user or device identifiers, job title, and company.
Contact Data	Email address, home address, business address, telephone number, and professional and/or social network contact details.
Financial Data	Credit card and/or billing information, bank details for payment.
Transaction Data	Information about payments and purchases, may include Health Data.

Technical Data	Internet protocol (IP) address, browser type and version, time zone setting and location, referral sources, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Site.
Usage Data	Information about how you use our Site and social media channels.
Audio/Visual Data	Image and/or voice.
Assessment Data	Information provided in response to questionnaires and consultations. May include Health Data.
Feedback Data	Feedback from user testing or market research, may include Health Data.
Marketing and Communications Data	Preferences in receiving marketing or other communications.
Health Data	Information about current health or medical history.

5. How will we use your personal information?

Below is how we use your personal information depending on who you are and the legal basis we rely on to do so:

5.1 Customers

Purpose	Data Used	Legal Basis
Manage and administer your account	Identity Data, Contact Data, Technical Data, Usage Data, Transaction Data, Assessment Data, Audio/Visual Data, Marketing and Communications Data	Contract performance
Assess suitability for treatments	Identity Data, Contact Data, Assessment Data, Audio/Visual Data, Health Data	Necessary for healthcare purposes under health professional responsibility
Process and fulfil transactions	Identity Data, Contact Data, Transaction Data, Financial Data, Audio/Visual Data, Health Data	Contract performance Necessary for healthcare purposes under

		health professional responsibility
Conduct consultations	Identity Data, Contact Data, Audio/Visual Data, Assessment Data	Contract performance
Clinical research (anonymised)	Various (anonymised)	Legitimate interests *We will not provide third party researchers with data that identifies you personally, unless you have provided explicit, informed consent to this or there is legal justification to provide this information.
Market research/user testing	Identity Data, Contact Data, Transaction Data, Audio/Visual Data, Feedback Data	Consent
Marketing communications	Contact Data, Marketing and Communications Data	Consent
Social media advertisements	Contact Data, Marketing and Communications Data, Usage Data, Technical Data	Consent
Support development and training of our large language models	Health Data, Audio/Visual Data and Assessment Data	Necessary for healthcare purposes under health professional responsibility
Service Messages	Contact Data	Legitimate Interests
Customer service and support	Identity Data, Contact Data, Transaction Data, Financial Data, Audio/Visual Data, Assessment Data	Legitimate interests
Technical support	Identity Data, Contact Data, Transaction Data, Assessment Data, Usage Data, Technical Data	Legitimate interests

Business operations	Identity Data, Contact Data, Transaction Data, Assessment Data, Audio/Visual Data, Feedback Data	Legitimate interests
Legal or regulatory compliance	Various	Legal obligation

5.2 Website Visitors

Purpose	Data Used	Legal Basis
Deliver relevant content	Technical Data, Usage Data	Legitimate interests
Measure content effectiveness	Technical Data, Usage Data	Legitimate interests
Improve Site and user experience	Technical Data, Usage Data	Legitimate interests
Administer and protect the Site	Technical Data, Usage Data	Legitimate interests
Assess treatment suitability	Identity Data, Assessment Data	Contractual Performance
Respond to contact messages	Identity Data, Contact Data	Legitimate interests

5.3 Social Media Users

Purpose	Data Used	Legal Basis
Analyse engagement	Usage Data, Technical Data	Legitimate interests
Communicate with users	Contact Data, Message content	Legitimate interests
Marketing communications	Identity Data, Contact Data, Marketing and Communications Data	Consent

5.4 Suppliers

Purpose	Data Used	Legal Basis
Contract creation, negotiation, and management	Identity Data, Contact Data, Transaction Data, Financial Data	Contract performance
Business relationship management	Identity Data, Contact Data, Transaction Data, Financial Data	Legitimate interests

Legal or regulatory compliance	Various	Legal obligation
--------------------------------	---------	------------------

5.5 Other Individuals

Purpose	Data Used	Legal Basis
Market research/user testing	Identity Data, Contact Data, Audio/Visual Data, Feedback Data	Consent

6. How do we collect personal information about you?

We may collect information from the following sources:

1. Directly from you

This is the information you (or an individual with authority to act on your behalf) has provided to us for the purposes set out in this Notice. It includes any information you provide to us when consulting with one of our clinicians, and when you interact with us by phone, email, web form or otherwise.

2. Third-party sources (for Suppliers)

Where you are a Supplier, this will include information about you or your colleagues that is available through publicly available sources, such as professional networking sites (including LinkedIn) and general market research

3. Automatically (Technical and Usage Data)

When you visit our Site, we collect certain Technical and Usage Data automatically from your device.

7. Who do we share your personal information with?

We may share your personal information with the following categories of third parties:

Category	Description
Service providers	Our service providers are required to keep your personal information strictly confidential and are not allowed to use it for any other purpose than to carry out the services they are performing for us.

Professional advisors	We may disclose personal information to our professional advisers, such as lawyers, auditors, accountants, and insurers, if necessary, as part of the professional services they are performing.
Business transfers	When we acquire businesses or merge with them there is a possibility that we may share personal information with these companies as part of that process. In any event you will be informed if this happens and if it applies to you.
Legal compliance	We may very occasionally be required to disclose some personal information as required to comply with the law.

8. Security and international data transfers

8.1 Security

We work tirelessly to safeguard the security and integrity of our Site and the systems we use to process your personal data. We have implemented widely accepted standards of technology and operational security (having regard to the type and amount of personal data processed) to prevent personal information being accidentally lost or used or accessed in an unauthorised or unlawful way. However, it is generally understood that no method of electronic storage or transmission online is 100% secure. As a result, whilst we have implemented appropriate technical and organisational measures, we cannot guarantee the absolute security of your personal data, or accept responsibility for any unauthorised access or loss of personal data that is beyond our control.

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

8.2 International data transfers

Where personal information is shared and disclosed as set out above, these parties may be established outside the United Kingdom. For example, some of the service providers we use to support our services are based in the United States, and this involves a transfer of your personal information to the USA.

Whenever we transfer your personal information outside the United Kingdom, we ensure that a similar degree of protection is afforded to it by ensuring appropriate safeguards are implemented. This may include, where appropriate, relying on an adequacy decision or Standard Contractual Clauses.

To find out more information regarding the specific mechanism used by us when transferring your personal information outside the United Kingdom, please contact our Data Protection Officer at DPO@manual.co.

9. Our use of cookies and similar technologies

We may use cookies and other information gathering technologies to learn more about how you interact with our Website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Site may become inaccessible or not function properly. Please see our Cookie Policy for more information about the cookies we use.

10. Third-party links and services

This Website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. How long will we keep your personal information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised 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.

12. Marketing

If you receive marketing communications from us, you can ask us to stop sending you marketing messages at any time by following the unsubscribe links in any marketing message or by contacting our Data Protection Officer at DPO@manual.co.

Please note that opting out of marketing communications does not opt you out of receiving important service-related communications.

13. Your rights

Subject to any exemptions provided by law, you may have the right to:

- Request access to your personal information (commonly known as a “data subject access request”) and to certain other supplementary information that this Notice is already designed to address.
- Request correction of the personal information we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information in certain circumstances. However, given the nature of our products and services, it will not always be possible for us to delete your data upon request as there may be valid legal reasons for us to continue processing it (for example, the need to retain medical records to comply with legal requirements). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Receive the personal information concerning you which you have provided to us in a structured, commonly used, and machine-readable format and have the right to transmit those data to a third party in certain situations.
- Object to processing of your personal information at any time for direct marketing purposes.
- Object to decisions being taken by automated means which produce legal effects concerning you or significantly affect you.
- Object in certain other situations to our continued processing of your personal information.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Withdraw your consent to our processing of your personal information, where we have collected and processed it with your consent.

For more information, please refer to the appropriate data protection legislation or consult the Information Commissioner’s Office for guidance. If you would like to exercise any of these rights, please contact our Data Protection Officer at DPO@manual.co and let us have enough information to identify you.

We may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. You have rights regarding your personal information, including the right to:

14. Contact Us

Please address requests and questions about this Notice to our Data Protection Officer at DPO@manual.co.

15. How to Complain

We hope that we can resolve any query or concern that you raise about our use of your personal information.

You also have the right to make a complaint to your supervisory authority. In the UK, this is the Information Commissioner's Office (www.ico.org.uk).

16. Changes to this Notice

This version was last updated on 12 December 2024. To ensure that you are always aware of how we use your personal information we will update this Notice from time to time to reflect any changes to our use of your personal information and as required to comply with changes in applicable law or regulatory requirements. However, we encourage you to review this Notice periodically to be informed of how we use your personal information.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.