

DECIPHERING HEALTH INDIA PVT. LTD.

PRIVACY POLICY

Last Updated: August 1st, 2023

1. INTRODUCTION

Deciphering Health India Pvt Ltd, a wholly owned subsidiary of Decipher Health, Inc., (“Decipher Health,” “we,” “us,” or “our”) respects the privacy of its Users (“User,” “your,” or “you”). This Privacy Policy (the “Privacy Policy”) explains how we collect, use, disclose, and safeguard your information when you use JoyHealth, Decipher Health’s mobile application (the “App”).

Decipher Health is committed to protecting the privacy of its Users whose information is collected and stored while using App.

The capitalized terms have the same meaning as ascribed in our [Terms of Service](#) as applicable, unless otherwise noted here.

THIS PRIVACY POLICY HAS BEEN DRAFTED IN ACCORDANCE WITH RULE 4 OF THE INFORMATION TECHNOLOGY (REASONABLE SECURITY PRACTICES AND PROCEDURES AND SENSITIVE PERSONAL DATA OR INFORMATION) RULES 2011 FOR PROCESSING PERSONAL INFORMATION ("RULES") AND RULE 3(1) OF THE INFORMATION TECHNOLOGY (INTERMEDIARIES GUIDELINES) RULES, 2011 (AS AMENDED) THAT REQUIRE PUBLISHING THE PRIVACY POLICY.

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. BY ACCESSING OR USING OUR APP, YOU AGREE TO ACCEPT ALL THE TERMS CONTAINED IN THIS PRIVACY POLICY AND ACKNOWLEDGE AND AGREE WITH THE PRACTICES DESCRIBED HEREIN. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS, AND USE OUR APP.

IF YOU HAVE ANY QUESTIONS REGARDING THIS PRIVACY POLICY, PLEASE SEND US AN EMAIL AT PRIVACY@DECIPHERHEALTH.COM.

JoyHealth is India’s first AI-based self-assessment and self-care management system for type-2 diabetes. Our approach leverages a first-of-its-kind AI engine to help diabetes patients in India navigate the choices that they face in their day-to-day lives. JoyHealth is an App designed to deliver real-time support allowing users to control their diabetes.

WE DO NOT SELL YOUR PERSONAL INFORMATION, NOR DO WE INTEND TO DO SO.

2. TERRITORIAL RESTRICTION

Our App is only available for use and download in India through our secure servers only. Our App is not available for use or download by residents of, visitors to, or your employees who reside outside India. If you do not reside in India, please do not download, register, and/or use our App. You must comply with this Privacy Policy and [Terms of Service](#) as applicable.

If you have any questions regarding this Section, please email us at privacy@decipherhealth.com.

3. WHAT INFORMATION DO WE COLLECT?

When you register to use our App, we collect personal information (also referred to as personally identifiable information or “PII”) which may include your name, address, online contact information such as your email address or username, phone number, Personal Medical and/or Health information and other personal information. The information so collected will be stored on our servers permanently.

- a. Geolocation and Equipment Information. We do not collect information that such as information about your internet connection, the equipment you use to access our App, and usage details. However, we will update this Privacy Policy when we start using and storing such information. We will also inform you via reasonable means if we start collecting such information from you.
- b. Financial Information. We currently do not collect or store any credit cards or bank information. However, we will update this Privacy Policy when we start using and storing such information. We will also inform you via reasonable means if we start collecting such information from you.

4. HOW DO WE COLLECT INFORMATION?

We collect personal information from you in the following ways:

- a. At registration on our App;
- b. Through mobile and desktop applications you download from our Platform, which provides dedicated non-browser-based interaction between you and our App;
- c. From forms filled out by you on our App;
- d. From records or copies of correspondences (including email addresses) if you contact us.

5. HOW DO WE USE YOUR INFORMATION?

We use the information that you provide to:

- a. Personalize your experience in using our App;
- b. Present our App and their contents to you;
- c. Provide you with notices about account including expiration notices;
- d. Carry out obligations and enforce rights arising from contracts entered into between you and us
- e. Notify you about changes to our App;
- f. Administer surveys or other App features;
- g. Anonymize data and aggregate data for statistics;

6. OUR COOKIE POLICY

Cookies are small pieces of text used to store information on web browsers. Cookies are used to store and receive identifiers and other information on computers, phones, and other devices. Other technologies, including data we store on your web browser or device, identifiers associated with your device, and other software, are used for similar purposes. In this Privacy Policy, we refer to all of these technologies as “Cookies.”

We do not use Cookies on our App. We do not include or offer third party products or services on our website We seek to protect the integrity of our App and welcome any feedback. Please contact us at privacy@decipherhealth.com.

7. HOW DO WE PROTECT INFORMATION WE COLLECT?

Our App is reasonably scanned to meet or exceed PCI Compliance. Our App uses an SSL certificate as a security measure. We require username and passwords for our employees who can access your personal information that we store and/or process on our Platform and servers. In addition, we actively prevent third parties from getting access to your personal information that we store and/or process on our Platform and servers.

8. DATA SECURITY MEASURES.

- a. Security Measures. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our App.
- b. Fair Information Practice Principles. In the event of a personal data breach, we will notify you within twenty one (21) days via (i) email and/or (ii) our notification system on our App. We agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.
- c. Open-Source Software: We use the following open-source software in the provision of our Services, which can be found [here](#).

9. DISCLOSURE OF PERSONAL INFORMATION

There are times when we may share Personal Information that you have shared with us may be shared by Decipher Health with others to enable us to provide you with Services, including contractors, service providers, and third parties (“Partners”). This section discusses only how Decipher Health may share such information with Partners. We will ensure that our Partners protect your Personal Information. The following describe how and with whom we may share your Personal Information:

Disclosure of Personal Information.

- a. We may disclose aggregated, de-personalized information about you that does not identify any individual to other parties without restriction.
- b. We may disclose personal information to our subsidiaries and affiliates.
- c. We may disclose personal information in the event of a merger, sale of business, etc.
- d. We require all other Partners, to whom we disclose your personal information, to enter into contracts with us to keep personal information confidential and use it only for the purposes for which we disclose it to such Partners.
- e. We may disclose personal information for any other purpose for which you have provided it.
- f. We may only disclose personal information as described in this Privacy Policy or your consent.

Other Disclosure of Personal Information.

- a. We will disclose personal information (i) to comply with any court order, law, or legal process, including to respond to any government or regulatory request, (ii) to enforce or apply our [Terms of Service](#) and other agreements, including for billing and collection purposes, (iii) if we believe it is necessary or appropriate to protect the rights, property, or safety of Decipher Health, our customers or others, and/or (iv) if it is necessary or appropriate to protect the rights, property, or safety of Decipher Health, or others, and this includes exchanging information with other companies and organizations for the purposes of fraud protection.

Third Party Disclosure.

- a. We do not sell, trade, rent, or otherwise transfer personal information to others. This does not include our hosting partners and other parties who assist us in operating our App, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.
- b. We do not provide non-personally identifiable visitor information for marketing purposes.

1. YOUR INDIA SPECIFIC PRIVACY RIGHTS

YOU SPECIFICALLY CONSENT TO DECIPHER HEALTH'S COLLECTION, USAGE, AND STORAGE OF YOUR PERSONAL HEALTH INFORMATION (SENSITIVE PERSONAL INFORMATION) FOR USING THE JOYHEALTH APP.

Decipher Health does not sell, trade, or otherwise transfer to outside third parties your Personal Information as the term is defined under Rules. To make a request for disclosure, review, correction, or identification of Personal Information in all our systems that we store on you, please send an email to privacy@decipherhealth.com or write us at Deciphering Health India Pvt. Ltd., D1101, The Palm Drive, Sector 66, Gurgaon, Haryana 122101, India. It is your responsibility to ensure that any and all information that you provide to us is accurate and current. You can request the us in writing, at any time, to stop the usage and collection of your information and delete your information.

If you would like to discuss our Personal Information storage and processing process with us, please send us an email at privacy@decipherhealth.com or write us at Deciphering Health India Pvt. Ltd., D1101, The Palm Drive, Sector 66, Gurgaon, Haryana 122101, India.

10. MODIFICATIONS TO OUR PRIVACY POLICY

Decipher Health reserves the right, at its sole discretion, to change or modify this Privacy Policy at any time. In the event we modify this Privacy Policy, such modifications shall be binding on you only upon your acceptance of the modified Privacy Policy. We will inform you about the modifications on our Privacy Policy page via email, on our App by posting a modified version of the Privacy Policy page, or by a comparable means within a reasonable time period. Your continued use of our App shall constitute your consent to such changes.

11. LIST OF THIRD-PARTY SERVICE PROVIDERS

Decipher Health uses the following third-party service providers for the provision of services as detailed under our [Terms of Service](#), as applicable:

Name of Third-Party Service Provider	Contact Information
Amazon Web Services Inc. (North Virginia, US)	Website: https://aws.amazon.com/premiumsupport/knowledge-center/aws-phone-support/ Address: 410 Terry Avenue North, Seattle, WA 98109-5210

Additionally, if you have any questions or concerns about our third-party service providers, please email us at privacy@decipherhealth.com.

12. COPYRIGHT INFRINGEMENT NOTICE

If you believe that any content on our App violates your copyright, and you wish to have the allegedly infringing material removed, the following information in the form of a written notification (“Takedown Notice”) must be provided to our designated Copyright Agent.

- a. Your physical or electronic signature;
- b. Identification of the copyrighted work(s) that you claim to have been infringed;
- c. Identification of the material on our App that you claim is infringing and that you request us to remove;
- d. Sufficient information to permit us to locate such material;
- e. Your address, telephone number, and email address;
- f. A statement that you have a good faith belief that use of the objectionable material is not authorized by the copyright owner, its agent, or under the law; and
- g. A statement that the information in the notification is accurate, and under penalty of perjury, that you are either the owner of the copyright that has allegedly been infringed or that you are authorized to act on behalf of the copyright owner.

Decipher Health’s Copyright Agent to receive Takedown Notices is Mridul Mehta, at mridul@decipherhealth.com and at Deciphering Health India Pvt. Ltd., Attn: Take Notice D1101, The Palm Drive, Sector 66, Gurgaon, Haryana 122101, India. You acknowledge that for us to be authorized to take down any content, your Takedown Notice must comply with all the requirements of this Section. Please note that any misrepresentation of material fact (falsities) in a written notification automatically subjects the complaining party to liability for any damages, costs and attorney’s fees incurred by Decipher Health in connection with the written notification and allegation of copyright infringement.

13. CONTACT US

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:

- Privacy Officer
- Email: privacy@decipherhealth.com
- Address: Deciphering Health India Pvt. Ltd., D1101, The Palm Drive, Sector 66, Gurgaon, Haryana 122101, India.

PLEASE NOTE: IF YOU USE OUR APP, YOU HAVE AGREED TO AND ACCEPTED THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY AND THE TERMS AND CONDITIONS SET FORTH IN OUR [TERMS OF SERVICE](#), AS APPLICABLE. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY OR OUR [TERMS OF SERVICE](#), PLEASE DO NOT USE OUR APP.