

Humanity: Privacy Policy

Last Updated: June 29, 2020

Humanity Inc., and its subsidiaries and affiliates, (collectively, “we”, “our” or “us”) respect the privacy of our participants (“you” or “user”). This Privacy Policy (“Policy”) describes how we collect and further process Personal Information we collect from or about you in connection with your participation in the Humanity surveys and/or the Humanity mobile application and connected websites at <https://humanity.health>, <https://thisishumanity.com> and <https://hmunity.com> (“Humanity”). It also tells you about your rights and choices with respect to your Personal Information, and how you can contact us if you have any questions or concerns.

Please read this Policy carefully. If you do not agree with this Policy or any part thereof, you should not access or use any part of Humanity, or otherwise provide us with your Personal Information.

1. Personal Information We Collect

In this Policy, “**Personal Information**” means any information related to an identified or identifiable individual and does not include data whereby personally identifiable information has been removed (such as anonymous data).

We collect Personal Information from you through your interaction with Humanity. We collect Personal Information about you from different sources listed below.

We collect the following Personal Information when you complete Humanity surveys (“**Survey Information**”):

- **Registration information.** When you begin Humanity surveys you provide us with Personal Information, such as your name, email address, telephone number, country, post code, your date of birth, your gender and information about your mobile device and fitness wearables.
- **Survey responses.** You provide us with health-related Personal Information when you complete Humanity surveys such as information relating to your diet, smoking, drinking, fitness regime, height and weight, and possible health-related or medical information.
- **Follow up questions.** After completion of Humanity surveys we will in some circumstances follow up with you to discuss. As part of this you may choose to provide us with additional information, including the content of any communications with us and your availability to discuss your answers.

We collect the following Personal Information as part of your further interaction with Humanity (“Humanity Information”):

Information Collected from You

- **Registration information.** When you register for Humanity, you provide us with Personal Information, including contact information such as your name, email address, telephone number and home address, and basic profile information such as demographic information including date of birth, ethnicity and gender, device information, username and password.
- **Location Data.** On an ongoing basis we will, with your consent, collect your location based on your GPS. You can turn off this function at any time in your device settings.
- **Health data.** On an ongoing basis you provide us with information, including video, audio and photos, relating to your health, lifestyle and fitness via your profile on Humanity, including exercise regime, health, lifestyle and wellbeing updates, diet, calorie intake, sleep patterns,, body metrics and goals.
- **Responses to periodic surveys.** We will circulate periodic surveys via Humanity or otherwise. When you complete these you provide us with information, including video, audio and photos, relating to your health and lifestyle interventions, cognitive behaviour and nutrition.
- **Correspondence and other communications.** When you communicate with us via Humanity or otherwise, you provide us with Personal Information, such as your name, email address, telephone number and the contents and nature of your correspondence with us, including complaints, queries and feedback on your use of the survey.
- **Identifiers and usage.** When you use Humanity we will automatically collect your IP address, advertising identifiers, engagement metrics and potentially non-personal information about your device including model, version and operating system.
- **Transaction information.** When you pay for products or services on Humanity we collect information on the purchases you have made, including details of payments made, products or services purchased and the timings of such payments.

Information Collected from Other Sources

- **Information from third party devices and wearables.** When you choose to connect Humanity with a third-party health and fitness related application, including Apple Healthkit we will receive additional health and lifestyle data from the third-party providers of those services. For more information on the devices and wearables we work with please see our [List of Third Parties](#).

- **Information from third party payment processors.** We obtain Personal Information about you from the third parties we work with to process your payments via Humanity, such as our payment processors Braintree and Apple App Store Payments. This information includes purchase details, username and transaction amount.
- **Medical records.** When you choose to provide us with access to some or all of your medical records as part of Humanity, we obtain these records directly from your medical practitioner or from a third-party partner.
- **Biospecimen results.** We use third parties to analyse biospecimens you choose to provide to us, e.g. blood or saliva samples. These third parties provide us with the results of the analysis, including raw data and the clinical biomarkers and genomics data, such as standard blood labs and DNA methylation profiles. However, we do not share Personal Information with these third parties and your sample is only connected to an anonymous order number in their database.

We also collect, use and share aggregated data such as statistical or demographic data for our purposes. Aggregated data may be derived from your Personal Information but is not Personal Information as this data will not directly or indirectly reveal your identity. For example, we may aggregate data about your use of Humanity to calculate the percentage of users accessing a specific feature. However, if we combine or connect aggregated data with your Personal Information so that it can directly or indirectly identify you, we will treat the combined data as Personal Information which will be used in accordance with this Policy.

2. How We Use Personal Information

We will use your Personal Information for one or more of the following purposes:

- **Establishing your eligibility for use of Humanity.** We use your Survey Information, with your explicit consent, to assess your eligibility to use Humanity. In particular we review the registration and Personal Information you provide to us as part of Humanity surveys to evaluate whether you would be an appropriate candidate to use Humanity.
- **Contacting you regarding your Humanity surveys.** We use the contact information you provide to us when completing Humanity surveys to communicate with you about your responses. It is in our legitimate interests to select and liaise with individuals who will be appropriate for using Humanity, and to inform unsuccessful applicants of their ineligibility.
- **Registering to use Humanity.** We use your Personal Information to perform our contractual obligation towards you to allow you to create an account. The Personal Information we process when doing so includes your registration information.

- **Analysing your rate of aging.** We use your Personal Information, with your explicit consent, to, on an ongoing basis, assess your rate of aging, which may include the use of machine learning. To do this we use your Survey Information, as well as Humanity Information including health data journal, periodic survey responses, biospecimen analysis, medical records and information from third party devices and wearables.
- **Allowing you to make purchases in Humanity.** We use your Personal Information to perform our contractual obligation towards you to allow you to purchase content within Humanity and to maintain a record of such purchases. The Personal Information we process when doing so includes your registration, contact and transaction information.
- **Improving Humanity.** We use your Humanity Information, with your explicit consent, as part of Humanity to analyse the efficacy of Humanity and to improve the machine learning models that assess aging rate. For this purpose we use all of the Personal Information set out above as part of Humanity.
- **Statistical and scientific research.** We use your Humanity Information, including Biospecimen Results, to conduct statistical and clinical research into health and the aging process. We do so on the basis of our legitimate interests in conducting such scientific research and statistical endeavours for the purpose of improving Humanity and researching health and aging implications.
- **Providing you with support and to respond to your requests and complaints, and to otherwise communicate with you.** If you reach out to us for support regarding Humanity, we will perform our contractual obligation towards you by using your Personal Information to respond and resolve your queries and facilitate support. It is also in our legitimate interests to otherwise communicate with you regarding your participation in Humanity, and to alert you to information regarding your account and purchases, and to provide you with reminders and updates on your participation. We will communicate with you via phone, email, text message, push notification and/or the Humanity website and mobile app. The Personal Information we process when doing so includes your correspondence with us, your name, contact details, device information and, to the extent applicable to your query or complaint, or our communication, usage and interaction information.
- **Improving or monitoring usage of Humanity.** It is in our legitimate interests to ensure the efficient operation of Humanity, which includes conducting troubleshooting, testing and research and to keep Humanity secure. When doing so we may use Personal Information that we automatically collect about you, such as identifiers, information on use and location data.
- **Monitoring and analysing trends and use of Humanity.** It is in our legitimate interests to analyse the use of Humanity. When doing so, we will process Personal Information that we automatically collect about you or that is generated about you when you use Humanity.

- **Enforcing the Humanity Terms of Service, complying with legal obligations and defending Humanity against legal claims or disputes.** It is in our legitimate interests to enforce our terms and policies, to ensure the integrity of Humanity and to defend ourselves against legal claims or disputes. Where we do so, we will use the Personal Information relevant to such a case. Some processing may also be necessary to comply with a legal obligation placed on us.

3. Who we Share Your Information With

We disclose Personal Information about you with the following recipients and in the following circumstances:

- **Vendors and service providers.** We rely on vendors and service providers for Humanity, such as:
 - **Cloud service providers** who we rely on for data storage, disaster recovery and to provide Humanity, such as Amazon Web Services located in the United States (the “US”);
 - **Application providers** providing cloud-based offerings that will be hosted and implemented by Humanity;
 - **Analytics providers** who help us to understand our user base and how Humanity is used, such as Google Analytics.
 - **Providers of online survey and communication functionality**, who we use to facilitate our Humanity surveys and other periodic surveys as part of Humanity, and to otherwise communicate with you including Typeform SL located in Europe and the US, and Mailchimp located in the US.
- **Biospecimen analytics labs and storage facilities** who we use to analyse and store your blood and saliva samples, and are located in various locations including the United Kingdom (the “UK”), US and Denmark.
- **With fitness and health applications or devices you choose to integrate.** You may integrate third party applications and devices with Humanity who will share data with us to track your fitness and health activity, including Apple Healthkit. We share certain integration information with these third parties, including username, device information and ID. Further information on the parties we work with can be found at our [List of Third Parties](#).
- **Medical kit providers** who we use to send out home sampling kits to our Humanity users, such as MedDX Solutions Limited. We provide them with your contact information, including address and name. Further information on the parties we work with can be found at our [List of Third Parties](#).

- **Blood draw and physician oversight partners**, who we work with to enable the drawing of blood samples at home and at work, and prescribe lab tests and channel users where biomarkers are out of range. We share certain contact information with these third parties, including name and contact information, and biospecimen results. Further information on the parties we work with can be found at our [List of Third Parties](#).
- **Payment processors**. We use payment processors such as Braintree (on web) and Apple App Store Payments (on your mobile device) in order to receive payment for the use of Humanity. Further information on the parties we work with can be found at our [List of Third Parties](#).
- **The Humanity group**. We share Personal Information about you with our branches and subsidiaries within the Humanity group.
- **Legal**. Information about our users, including Personal Information, will be disclosed to law enforcement agencies, regulatory bodies, public authorities or pursuant to the exercise of legal proceedings if we are legally required to do so, or if we believe, in good faith, that such disclosure is necessary to comply with a legal obligation or request, to enforce our terms and conditions, to prevent or resolve security or technical issues, or to protect the rights, property or our safety, or the safety of our users, a third party, or the public.
- **Change of corporate ownership**. If we are involved in a merger, acquisition, bankruptcy, reorganisation, partnership, asset sale or other transaction, we may disclose your Personal Information as part of that transaction.

4. Your Rights and Choices

If you are located in Europe, in certain circumstances, you have the following rights in relation to your Personal Information that we hold.

- **Withdrawal of consent**. Where we rely on consent for the processing of your Personal Information, you have the right to withdraw your consent at any time:
 - If you wish to withdraw your consent for the processing of your health data, please email us at privacy@humanity.health.
 - If you wish to withdraw your consent for the sharing of your health data by integrated third party applications and devices, you can do so in the settings of your device.
- **Access**. You have the right to access the Personal Information we hold about you, and to receive an explanation of how we use it and who we share it with.

- **Correction.** You have the right to correct any Personal Information we hold about you that is inaccurate or incomplete.
- **Erasure.** You have the right to request your Personal Information be erased or deleted.
- **Object to processing.** You have the right to object to our processing of your Personal Information where we are relying on a legitimate interest or if we are processing your Personal Information for direct marketing purposes.
- **Restrict processing.** You have a right in certain circumstances to stop us processing your Personal Information other than for storage purposes.
- **Portability.** You have the right to receive, in a structured, commonly used and machine-readable format, Personal Information that you have provided to us if we process it on the basis of our contract with you, or with your consent, or to request that we transfer such Personal Information to a third party.

Please note that, prior to any response to the exercise of such rights, we will require you to verify your identity. In addition, we may have valid legal reasons to refuse your request, and will inform you if that is the case. For more information on or to exercise your rights, please email privacy@humanity.health.

5. **Cross-Border Data Transfers**

We may transfer your Personal Information outside of the country where you are located and the European Economic Area, including to the US where we are based and the UK. Regardless of where your Personal Information is transferred, we shall ensure that relevant safeguards are in place to afford adequate protection for your Personal Information. Further details regarding the relevant safeguards can be obtained from us on request.

6. **Children's Privacy**

Neither the Humanity surveys, nor any aspect of Humanity are directed to children, and we do not knowingly collect Personal Information from anyone under the age of 18. If you learn that a child has provided us with Personal Information in violation of this Policy, please contact us as indicated below.

7. **Data Retention**

We store all Personal Information for as long as necessary to fulfil the purposes set out in this Policy, or for as long as we are required to do so by law or in order to comply with a regulatory obligation. When deleting Personal Information, we will take measures to render such Personal Information irrecoverable or irreproducible, and the electronic files which contain Personal Information will be permanently deleted. Alternatively, we ensure that it is only kept by us in an anonymized form.

8. Data Security

We use certain physical, managerial, and technical safeguards that are designed to improve the integrity and security of Personal Information that we collect and maintain. However, the transfer of Personal Information through the internet will carry its own inherent risks and we do not guarantee the security of your data transmitted through the internet. You make any such transfer at your own risk.

Humanity may contain features or links to websites and services provided by third parties. Any information you provide on third-party websites or services is provided directly to the operators of such websites or services and is subject to those operators' policies governing privacy and security, even if accessed via Humanity. We are not responsible for the content or privacy and security practices and policies of third-parties to which links or access are provided through Humanity. We encourage you to learn about third parties' privacy and security policies before providing them with your Personal Information.

9. Changes to this Policy

We will notify you of any material changes so that you have time to review the changes.

10. Complaints

If you wish to lodge a complaint about how we process your Personal Information, please contact us at privacy@humanity.health. We will endeavour to respond to your complaint as soon as possible. You may also lodge a claim with the Information Commissioner's Office in the UK or the data protection supervisory authority in the EU country in which you live or work, where you believe we have infringed data protection laws.

11. Our Contact Information

Humanity Inc. is the entity responsible for the processing of your Personal Information, and for the purpose of the European Union's General Data Protection Regulation, is the data controller in respect of the processing of your Personal Information. If you have any questions or comments about this Policy, our privacy practices, or if you would like to exercise your rights with respect to your Personal Information, please contact us by email at privacy@humanity.health

If you are located in Europe, you may alternatively write to our EU representative at:

Humanity Health
110 Clifton Street
London
EC2A 4HT