

PRIVACY POLICY – FLUID FOCUS

Thank you for using the website of Fluid Focus Ltd (**we, us or Fluid Focus**) and/or the Fluid Focus App.

This privacy policy (**policy**) informs you about how we look after your personal data when you interact with us as a user of the mobile application Fluid Focus (**Fluid Focus App**) (the most recent version being available to download on App Store for IOS devices and Play Store for Android devices (**App Stores**) onto your mobile telephone or handheld device (**Device**)) and when you visit or use our website <https://www.fluidfocus.app/> (regardless of where you visit it from) (**website**).

This policy also applies to personal data processed by us in relation to any of the services accessible through the Fluid Focus App (**Services**).

This policy explains how we handle your personal data, your privacy rights, and the legal protections in place. It covers all personal data processing by Fluid Focus. It is crucial to read this policy to understand how and why we use your data.

Please note that if you download the Fluid Focus App through App Stores, you may be subject to the relevant App Store's terms and privacy policy, which you should read separately. For reference, Google Play Store's privacy policy can be accessed at <https://policies.google.com/privacy>; and Apple App Store's privacy policy can be accessed at <https://www.apple.com/uk/legal/privacy/en-ww/>.

Before using the Fluid Focus App or Services, you (individually, or someone acting on your behalf (such as a parent or guardian where you are underage or unable to enter into contracts)) need to have agreed to our standard user Terms of Use.

1. WHO WE ARE

1.1 Contact Details

Full Name of Legal Entity:	Fluid Focus Ltd, a company incorporated in England under registered company number 14337365.
Postal Address:	Innovation Northumbria: Incubator, 115 New Bridge Street, Newcastle upon Tyne, NE1 8ST
ICO Registration Number:	ZB660175 (this is the number under which we are registered with the UK Information Commissioner's Office as a fee paying "controller" of personal data).
Contact email address:	help@fluidfocus.app

- 1.2 Under the UK General Data Protection Regulation or the EU General Data Protection Regulation (collectively **GDPR**) and other relevant data protection legislation, we act as controller of your personal data and we may occasionally appoint third parties to process your personal data on our behalf (those third parties being known as "processors").

1.3 Third-Party Links & Stores

Our websites and the Fluid Focus App may include links to third-party websites, online stores and marketplaces, widgets, plug-ins and applications (including social media platforms). Clicking on those links or enabling those connections may allow third parties to collect or share data about you or allow you to import data from those third party applications or websites into the Fluid Focus platform.

We do not control these third-party websites or applications and are not responsible for their privacy statements or anything you do on those websites, stores or marketplaces. When you leave our website or application, we encourage you to read the privacy policy of every third-party website or application you visit and the terms and conditions of each contract for sale before you enter into it.

2. FLUID FOCUS APP

What kind of personal data does Fluid Focus process on Fluid Focus App?

2.1 Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you when you use the Fluid Focus App, which we have grouped together as follows.

2.2 When you use in the Fluid Focus App, we may collect, use, store and transfer the following kinds of personal data about you:

- **Technical Data** which is your device ID, which will be used to facilitate support queries related to your device profile;
- **Usage Data** which is a record of all completed “focus sessions” and “rest sessions” associated with your device profile which may include your interactions with ‘focus music’, ‘focus breathwork’ and ‘focus meditation’ sessions, the active and inactive screen-time metrics for the device on which the Fluid Focus App has been installed and how you have earned and used “Fluid Coins”; and
- **Identity Data** which is a record of your month and year of birth, your gender, and, where applicable, organisational details such as your campus, department, office or student/employee type.

2.3 When you choose to create an account with the Fluid Focus App, we may also collect, receive, use, store and transfer the following different kinds of personal data about you:

- **Account Registration Data** which is the data you provide to us when creating an in-app account in the Fluid Focus App.

If you choose to create an account with your Apple Inc. (USA) (**Apple**) account or Meta Platforms Ireland Ltd. (Ireland), Meta Platforms, Inc. (USA) (**Facebook**), or Google Ireland Ltd. (Ireland), Google LLC (USA) (**Google**) or you later decide to connect your Apple, Facebook or Google account to your Fluid Focus App account, you will be transferred from the Fluid Focus App to the website of Apple, Facebook or Google and asked to enter the log-in details for your Apple ID, Facebook or Google account.

In these circumstances, we will receive certain data from Apple, Facebook or Google (as applicable) as follows:

- If you enter your Apple ID log-in details, we will receive the following data from Apple regarding your Apple ID account (you may choose not to provide your email address by using Apple’s Private Email Relay Service): full name; email address; and Apple ID.
- If you enter your Facebook log-in details, we will receive the following data from Facebook regarding your Facebook account (you may choose not to provide your email address): full name; email address; and Facebook account ID.
- If you enter your Google log-in details, we will receive the following data from Google regarding your Google account: profile photo; full name; Google account ID; and email address.

Please note that the profile photo and/or name used for your Apple ID, Facebook or Google account will not be used for your Fluid Focus App account and will not therefore be visible to other users of the Fluid Focus App.

- **Health Data** which is health data that you consent to input into the Fluid Focus App. You may choose to record mood and/or sleep quality information (for example, mood can be logged via an emoji reaction, while sleep can be logged through a swipeable time bar) while using the Fluid Focus App. This information will not be visible to other users of the Fluid Focus App. You may withdraw your consent to this use of your data at any time by deleting your Fluid Focus App account.
- **Location Data:** There is no location data tracking occurring in our app. The only location-related information used during sign-up is the country provided by the App Store / Google Play, which is used for eligibility and regional checks. Beyond that, we do not perform ongoing location tracking or collect GPS/location data.

- **Financial Data.** Where you choose to purchase a premium subscription through the Fluid Focus App, all payments are processed entirely by Apple Inc. via the Apple App Store or Google LLC via Google Play. Payment transactions are handled directly by Apple or Google under their respective terms; we do not collect, process or store your payment card or financial details.

We may receive limited transaction data from Apple or Google - such as confirmation of a successful purchase or your current subscription status - solely to verify your entitlement to premium features within the Fluid Focus App.

If you are making a purchase using an account that is not yours (for example, a parent's Apple ID or Google account), you should bring this notice to the account holder's attention and obtain their permission before proceeding. The account holder is responsible for all purchases made under their account.

For further information on how payment data is handled, please refer to Apple's App Store Terms of Service at <http://www.apple.com/legal/internet-services/itunes/us/terms.html> and Google Play's [Payment Policy](https://payments.google.com/payments/apis-secure/get_legal_document?Ido=0&Idt=buyertos&Idr=uk) at https://payments.google.com/payments/apis-secure/get_legal_document?Ido=0&Idt=buyertos&Idr=uk.

Please note: if you access the Fluid Focus App through an institutional licence, premium features are provided through your institution and this section does not apply to you.

- 2.4** Where your financial account is used in connection with another individual's Fluid Focus App account (for example, your child's), you remain the primary account holder and the data subject in respect of any personal data processed in relation to that account. We may process personal data arising from the individual's use of the account; however, such data will be treated as part of your account information.
- 2.5** With the exception of certain Health Data that you choose to input into the Fluid Focus App (as expressly set out and described in this document), we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) through use of the Fluid Focus App. Nor do we collect any information about criminal convictions and offences.
- 2.6** Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, you may not be able to use the Fluid Focus App.
- 2.7** It is important that the data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

How is your Fluid Focus App information used?

- 2.8** We will only use your personal data when the law allows us to. In connection with your use of the Fluid Focus App, we use Technical Data, Usage Data and Identity Data (which we collect directly from you, or through your use of the Fluid Focus App) on the basis of consent, the contract between you and us, or for Legitimate Interests (to run our business):
- to operate, maintain and improve Fluid Focus App and its related features and Services;
 - to give you access to and permit your use of Fluid Focus App and related features and Services, engage with the content or otherwise interact with the Fluid Focus App and Services (including the generation of statistics and insights regarding use of the App, and support generation and use of our "Fluid Coins");
 - to provide technical support or customer service;
 - where we need to comply with a legal or regulatory obligation;
 - to anonymise and aggregate so that your information is no longer personal data and can be used outside as described in this Privacy Policy;
 - ancillary purposes, such as back-ups and archiving;

- dealing with legal obligations (such as compliance with tax law, identity verification requirements and preparing company accounts) and disputes.

We will generally only use your personal data for the purposes for which we collected it, unless permitted by law or we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated and incompatible purpose, we will notify you where necessary and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. Where we rely on legitimate interest, you can contact us for more details on the consideration of these interests.

Where we have anonymised any of your personal data or collected any other data which could not be used to identify you, we may use it in our effort to improve the website, the Fluid Focus App and Services and/or run our business (including by combining it with third party data sources). We may share such non-identifying information with our users and service providers, affiliates, and other third parties for any purpose and without any royalties.

- 2.9 We rely upon your consent in order to place the App on your device, and for it to operate alongside the other apps on your phone and gather the metrics used to support “focus sessions” and “rest sessions” and generate “Fluid Coins”. You give your consent for us to do this by downloading, opening and configuring use of the App. You can withdraw this consent at any time by deleting the App from your phone.

3. FLUID FOCUS WEBSITE & SERVICES AND OTHER INTERACTIONS WITH US

What kind of personal data does Fluid Focus process when you use the website and services?

- 3.1 Other than in relation to the Fluid Focus App (which is dealt with only under paragraph 2 above), we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, online username or similar identifier;
- **Contact Data** includes email address, physical address and telephone numbers;
- **Financial Data** includes bank account and payment card details;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, referral source, length of visit and pages viewed on the website, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- **Usage Data** includes information about journey through the login/sign-up process and how you use our website;
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences;
- **Survey Data** includes the information you provide (including by way of testimonials) in response to any surveys or feedback questionnaires made available to you by us or our third-party service providers that have been appointed to support us in survey and feedback data collection;
- **Employment Data** includes data which may be provided to us during a recruitment campaign and included on your CV, covering letters and on any responses to job applications and selection processes, including your racial or ethnic origin, religious or philosophical beliefs and trade union membership.

- 3.2 Other than Employment Data, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) through use of the website or when otherwise dealing with or concerning you. Nor do we collect any information about criminal convictions and offences.

- 3.3 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our Services). In this case, we may not be able to provide those Services.

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

How is your personal data used?

- 3.5** We will only use your personal data when the law allows us to. We use different methods to collect personal data from and about you. The ways we collect it, what we collect and how and why we use that personal data is set out below:

Personal Data Type	Collection Method	Basis of Use	Purpose
Contact before and during a contractual relationship with you or a party to whom you are affiliated or related			
- Identity Data - Contact Data - Financial Data	- Interactions instigated by you - Data capture forms - Through entering competitions and promotions	- Contract - Legitimate Interests (to run our company)	- To contact you and dealing with your queries - To register you as a supplier and manage relationship - To analyse and improve user relationships and interactions - To perform a contract we have entered into with you or a third party (like your employer) - To manage payments and charges - To provide billing information to you - Collecting and recovering money owed to us
- Identity Data - Contact Data - Marketing and Communications Data	From third parties like social media companies, advertising networks, electronic payment providers, data aggregators or your employer	- Consent - Contract - Legitimate Interests (to run our company or deliver services to you)	- To deliver our goods / services to you - To occasionally provide marketing content
Health Data	- Interactions instigated by you - Data capture forms	Consent	- To anonymise and aggregate so that your information is no longer personal data and can be used outside as described in this Privacy Policy - To analyse and improve user interactions
Whenever you interact with our website or tracked emails			

• Technical Data • Usage Data • Marketing and Communications Data	• Interaction with websites • use of cookies	• Legitimate interests (to administer our IT systems) • Legitimate interests (to place cookies in accordance with our cookie policy, where consent is not required)	• To permit access to our Site • To keep our online avenues working, up to date and effective • To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) • To deliver our websites content to you, measure website traffic, measure user interests and traffic patterns, and improve our website and the services and features offered via our website • As otherwise described in our Cookie Policy
• Usage Data • Marketing and Communications Data	• use of cookies and cookie management banner	• Consent	• To customise features and advertising that appear on our websites • As otherwise described in our Cookie Policy
In connection with surveys carried out by / for us			
• Survey Data	• Data capture forms, surveys and feedback questionnaires	• Legitimate Interest (to advertise our business, the Fluid Focus App and the Services)	• To display the testimonial on our website and other marketing collateral and communications (without limit on duration)
Whenever you apply for a job with us			
• Identity Data • Contact Data • Employment Data	• From you or recruitment agencies	• Contract • Legitimate Interests	• To manage recruitment, selection and employment
Ancillary processing			
• any of the above	• as above	• Legitimate interests (to protect and run our company) • Compliance with law	• To anonymise and aggregate so that your information is no longer personal data and can be used outside as

			described in this Privacy Policy • Ancillary purposes, such as back-ups and archiving • Dealing with legal obligations (such as compliance with tax law, identity verification requirements and preparing company accounts) and disputes
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Please note that the above lists may be non-exhaustive. We will generally only use your personal data for the purposes for which we collected it, unless permitted by law or we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated and incompatible purpose, we will notify you where necessary and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. Where we rely on legitimate interest, you can contact us for more details on the consideration of these interests.

NOTE:

Legitimate Interest can mean our interest or the interest of another party. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Consent

Whenever we rely on your consent (as noted above), you have the right to revoke such consent at any time by emailing help@fluidfocus.app.

Marketing

If you are a customer of ours, we may contact you from time to time by call or email to provide some information about our products or services. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us, as appropriate, at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service experience or other transactions.

We will get your express opt-in consent before we share your personal data with any company outside of our own for marketing unrelated to our company.

Aggregated, Anonymised or Non-Identifying Information

Where we have anonymised any of your personal data or collected any other data which could not be used to identify you, we may use it in our effort to improve the website, the Fluid Focus App and Services and/or run our business (including by combining it with third party data sources).

We may share such non-identifying information with your employer or your academic institution who has authorised your use of the App and Services, our users and service providers, affiliates, and other third parties for any purpose and without any royalties.

4. WHAT INFORMATION IS SHARED?

- 4.1** We do not disclose personal data outside Fluid Focus, except in the situations listed in this paragraph, but may have to share your personal data with the categories of “processors” or “controllers” of personal data as described below, for the purposes set out in paragraphs 2 and 3 of this Privacy Policy:
- 4.1.1 with your employer or your academic institution who has authorised your use of the App and Services, provided that any such data shall be limited to non-identifying information (as described above) such as statistics on the usage of particular elements of the Services or Fluid Focus App, or details of how users have generally interacted with Fluid Focus or achieved certain outcomes or results via the App;
- 4.1.2 with HM Revenue & Customs, regulators and other authorities based in the United Kingdom, or other jurisdictions in which we do business and to whose laws we are subject, where reporting of processing activities are required in certain circumstances;
- 4.1.3 with third party purchasers, if we buy, sell or merge any business or assets of our business and are required to share data as part of the buying, selling or merger agreement or if our assets are acquired by a third-party, and data is transferred as part of the purchased assets. If any such change happens, we will ensure that it is under terms that preserve the confidentiality of your personal data, and we will notify you on our website or by email before any transfer of your personal data;
- 4.1.4 with professional advisers (including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services);
- 4.1.5 with sub-contractors such as consultancy staff whom we use to deliver the Services, facilitate sales activities in specific jurisdictions and assist us with other services relating to the Services, such as technical support or copyrighting;
- 4.1.6 with specific selected third parties, determined by us, if you breach any agreement with us, including so as to enforce our rights against you, including debt-collection firms or service providers, solicitors or barristers and law enforcement agencies (if applicable);
- 4.1.7 with our third party-subcontractors providing website and Fluid Focus App design and development services, based in the EU (with data stored in UK or EU based servers) and Ukraine. When we transfer data to them, we will remain responsible for it, and will ensure we have a lawful mechanism under UK GDPR and EU GDPR to permit such transfers (namely UK/EU Adequacy Decisions, standard contractual clauses under EU GDPR or the UK international data transfer agreement under UK GDPR);
- 4.1.8 with service providers acting as processors based in the European Union, United Kingdom and the United States who provide IT and system administration services:
- survey and questionnaire service providers in order to collect feedback from users;
 - analytical service providers in order to analyse our website’s traffic to improve products and services such as Squarespace Analytics or Google Analytics in order to analyse our website traffic or Fluid Focus App usage to improve them and our Services; and
- 4.1.9 with other parties where you ask us to share that data, or we ask you and you consent.
- 4.2** We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process the minimal personal data required for the specified purposes, in accordance with our instructions, where they have agreed to privacy restrictions similar to our own policy.
- 4.3** We do not share, sell, rent, or trade personal data with third parties for their commercial purposes. However, we may share non-identifying information (as described above) with users, affiliates, and other third parties for any purpose. For example, we may compile statistics on the usage of particular elements of the Services or Fluid Focus App, or details of how users have generally interacted with Fluid Focus or achieved certain outcomes or results via the App.
- 4.4** We may also share personal data with your permission, so we can perform services you have requested.

- 4.5** We may also disclose personal data or other information we collect about you to law enforcement in response to a valid subpoena, court order, warrant, or similar governmental order, or when we believe in good faith that disclosure is reasonably necessary to protect our property or rights, or those of third parties or the public at large. In complying with court orders and similar legal processes, we strive for transparency. When permitted, we will make a reasonable effort to notify users of any disclosure of their information, unless we are prohibited by law or court order from doing so, or in rare, exigent circumstances.

5. HOW IS YOUR INFORMATION SECURED?

- 5.1** We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We follow generally accepted industry standards to protect the personal data we hold, both during transmission and once we receive it.
- 5.2** In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They are required to only process your personal data on our instructions and they are subject to duties of confidentiality.
- 5.3** We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- 5.4** No method of transmission, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

6. HOW IS INFORMATION COLLECTED AND STORED GLOBALLY?

- 6.1** We provide the same standard of privacy protection to all our users around the world, regardless of their country of origin or location, and we are proud of the levels of notice, choice, accountability, security, data integrity, access, and recourse we provide. We work hard to comply with the applicable data privacy laws wherever we do business.
- 6.2** We do not transfer your personal data outside the UK other than to the European Economic Area (**EEA**) other than to the parties listed in paragraph 4 where it is noted they are based outside UK / EEA. For these recipients, we ensure that a similar degree of protection is enforced as is required within the UK by ensuring that the recipients use and are bound by standard contractual clauses which may be enforceable by you regarding data protection (as well applying appropriate additional security measures), or the recipient countries have been deemed to provide an adequate level of protection by the UK (which currently mirror the decisions taken by the European Commission ([further details](#))).

7. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to

processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you are a citizen of the United States of America you may have certain rights under the relevant data protection laws in your state, such as the CCPA (CPRA) if you are in California, the CPA in Colorado, the UCPA in Utah, the CTDPA in Connecticut and the VCDPA in Virginia.

If you wish to exercise any of the rights set out above, please contact us. Note, however, that we may not always be able to comply with your request for specific legal or compelling legitimate reasons which will be notified to you, if applicable, at the time of your request.

You will not have to pay a fee to access your personal data (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.

Where you exercise one of your rights, we may need to request specific information from you to help us confirm your identity and ensure your right to exercise such rights. This is a security measure to ensure that personal data 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.

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.

8. DATA RETENTION AND DELETION

- 8.1** We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 8.2** To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 8.3** We will keep your personal data for the term you have consented to, for the duration of your use of the Fluid Focus App where there is a legitimate interest for us to remain in contact with you, or for the legally required period, whichever is the longest. If you withdraw your consent for processing of your health data, please delete your Fluid Focus App or please inform us of your withdrawal of consent by emailing us directly at help@fluidfocus.app with the subject line "Data Privacy". We will promptly delete or anonymise your health data on receipt of your request to do so or on your account closure (as applicable).

8.4 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. Fluid Focus will retain personal data on your behalf whilst either: a) valid grounds for processing exist; or b) a maximum of two months following termination of your Fluid Focus user account; or c) fourteen months following last use of your Fluid Focus account.

8.5 If you would like to cancel your Fluid Focus App user account and initiate deletion of your personal data, you may do so by contacting us at: help@fluidfocus.app. As above, we will retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, maintain security, and enforce our agreements, but barring legal requirements, the timeframe above will be observed for deletion.

9. WILL THIS PRIVACY POLICY CHANGE?

If there are material changes to this policy or in how we use your personal data, we will prominently post such changes on our website prior to implementing the change. We encourage you to periodically review this policy to be informed of how we are collecting and using your information.

We keep this policy under regular review, for example, to reflect changing business circumstances and legal developments.

Although most changes are likely to be minor, it may change and if it does, these changes will be posted on our website and, where appropriate, notified to you when you next log on to use the Fluid Focus App. Otherwise, any changes shall be applicable without further notice.

10. WHAT HAPPENS IF YOU HAVE A QUESTION OR COMPLAINT?

10.1 If you have concerns about the way Fluid Focus is handling your personal data or just want to get in touch with us, please do not hesitate in contacting us by emailing us directly at help@fluidfocus.app with the subject line "Data Privacy".

10.2 If you are a data subject based in the UK or European Union, you may have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk), or other competent supervisory authority of an EU member state if the Services are accessed outside the UK but from another EU member state. We would appreciate the chance to deal with your concerns before you approach such bodies so would ask that you please contact us in the first instance.

11. LEGAL

This policy shall be governed by and interpreted in accordance with the laws of Northern Ireland, and you irrevocably agree that the courts of Northern Ireland shall have exclusive jurisdiction to settle any dispute which may arise out of, under, or in connection with this policy, the Fluid Focus website or Fluid Focus App or Fluid Focus' use of your data.