

Bloom for Women LLC, d/b/a Noble Health App (located at: 199 North 290 West, Ste. 150, Lindon, UT 84042) is the data controller of your personal information which is processed through the Upheal app during sessions.

**1. WHAT PERSONAL DATA ARE PROCESSED THROUGH THE APP?**

Your data:

<b>CATEGORY</b>	<b>DATA ITEMS</b>
<i>Identifying data</i>	<i>Name, last name, email address, phone number</i>
<i>Personal details</i>	<i>Spoken language, country</i>
<i>Recording</i>	<i>Audio and video recording of the session</i>
<i>Usage data</i>	<i>Session date and time, length</i>
<i>Health data</i>	<i>Session transcript &amp; insights, audio and video of the session, clinical notes</i>

**2. WHY IS YOUR DATA USED?**

Your data is used for:

<b>PURPOSE</b>	<b>DATA CATEGORY</b>	<b>LEGAL BASIS</b>	<b>ARE YOU OBLIGED TO PROVIDE THE DATA?</b>	<b>HOW LONG DO I KEEP YOUR DATA?</b>
<i>Provision of the app service</i>	<i>Identifying data, personal details, usage data</i>	<i>The performance of the contract</i>	<i>Yes. Failure to provide such data will result in the inability to provide you with the service</i>	<i>For 6 years</i>
<i>Provision of the app</i>	<i>Health data (therapy session)</i>	<i>Your consent</i>	<i>Yes. Failure to provide such data and the</i>	<i>For 6 years</i>

<i>service</i>	<i>transcript &amp; insights, medical notes)</i>		<i>consent will result in the inability to provide you with the service</i>	
<i>Provision of the app service</i>	<i>Recording of the audio and video</i>	<i>The performance of the contract and your consent for health data</i>	<i>Yes. Failure to provide such data and the consent will result in the inability to provide you with the service</i>	<i>The duration of the session</i>
<i>Storage of the audio and video recording</i>	<i>Audio and video recording</i>	<i>Your consent, which you will express specifically during the session in the app</i>	<i>No. It is always optional to provide the consent for the storage of the audio and video recording</i>	<i>For 6 years. But you can always withdraw your consent and the recording will be deleted immediately</i>

**3. HOW IS YOUR PERSONAL DATA USED?**

Upheal is an app which creates notes based on what’s discussed during healing sessions. Using AI, the app transcribes the conversation and provides summaries and insights. As a result, your healing professional will not spend time writing notes and can focus on being there for you.

At the end of the session the generated transcript will be revised to get to final notes, therefore there is no decision based solely on automated processing – it is always by your healing professional’s intervention. The recording of the session will not be stored unless you express consent before starting. For more about the Upheal app visit <https://www.upheal.io>.

**4. WHO CAN ACCESS YOUR PERSONAL DATA ?**

Your data can be accessed or communicated to:

- processors: hosting providers, suppliers of IT services and application software
- public or private bodies to whom it might be necessary to disclose the data

Disclosure for Law Enforcement: your personal data can be disclosed outside the scope of these provisions only as required to do so by law or compelled by court, government or administrative agency of competent jurisdiction. Personal data from users may be subject to federal and local laws that require the disclosure of data in certain circumstances.

Upon your request, your personal data, including medical and behavioral information, can be shared with other healthcare providers or any other individual or entity that you instruct me to inform.

## **5. WHERE IS YOUR DATA PROCESSED?**

Some suppliers (IT services, hosting providers) operate in Europe and others in the US. Therefore, it is possible that your data will be processed outside of your country/region. In this case, the data transfer will take place only in the presence of adequate safeguards provided for by the applicable law.

## **6. HOW ARE YOU SUPPORTED IN DEALING WITH DATA SUBJECT RIGHTS?**

**6.1. If you are from the European Union, Switzerland or UK** remember that you can: access and correct your data.

- You can obtain the erasure of your personal data under certain circumstances.
- You also have the right to restrict the processing of your personal data.
- You can withdraw your consent at any time.
- Moreover, you can receive a copy of your personal data or ask your healing professional or entity to transmit that data to another controller, where technically feasible.

- You can lodge a complaint with the supervisory authority of your country in case you think that your rights have been breached.
- If you wish to exercise one of these rights, you can write to [hello@noble.health](mailto:hello@noble.health)

**6.2.** Remember that under **HIPAA** you can always request access and amendment of your data.

**6.3. If you are from California remember that** the CCPA provides California consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

The Right to Know: You have the right to request the disclosure of the personal information collected, used, disclosed or sold about you in the previous twelve (12) months. You may also request a copy of the personal information collected on you over the past twelve (12) months.

The Right to Deletion: You have the right to request the deletion of any of your personal information collected from you and retained, subject to certain exceptions. Once your verifiable request is received and confirmed, your healing professional or entity will direct service providers to delete your personal information from any records, unless an exception applies.