

Privacy Policy

Effective Date: 13.12.2024

Last Updated: 13.12.2024

1. Introduction

ESB Healthcare Ltd ("we," "our," or "us") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, and safeguard your information when you use our website and services, including AI-generated health, workout, and diet plans, and the "share chat" feature.

By using our services, you agree to this Privacy Policy. If you do not agree, please discontinue use of our services.

2. Data We Collect

We collect the following categories of information:

2.1. User Inputs

- Data you provide when interacting with the chatbot or related tools (e.g., health-related questions, workout preferences).
- This data is processed by OpenAI via their API and is not stored by us.

2.2. Shared Messages

- Data shared through the "share chat" feature is stored in Firebase Firestore. This data is linked to a randomly generated user ID and not to any personal identifiers.

2.3. Technical Data

- Information such as IP addresses, device type, browser information, and usage statistics, collected via cookies and tracking technologies.

2.4. Data from California Residents (CCPA)

- Information falling under the CCPA categories, such as identifiers (user ID), internet activity (technical data), and inferred preferences from chatbot interactions.
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3. Purpose of Data Processing

We process your data to:

1. Provide personalized AI-generated responses.
 2. Facilitate communication between users through the "share chat" feature.
 3. Improve user experience and enhance our services.
 4. Comply with legal obligations and protect user safety.
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4. Legal Basis for Processing

For users in the European Economic Area (EEA):

1. **Consent:** For processing sensitive health-related inputs.
2. **Legitimate Interests:** For pseudonymized data stored in Firebase to support the chat feature.
3. **Contractual Necessity:** To provide requested services.

For users in the United States:

1. **CCPA Compliance:** Data collected is for service provision and is not sold.
 2. **HIPAA Compliance:** If applicable, data related to health is safeguarded under HIPAA rules.
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5. User Rights

5.1. GDPR Rights (EEA Users)

You have the right to:

- **Access:** Request a copy of your personal data.
- **Rectify:** Correct inaccuracies in your data.
- **Delete:** Request deletion of your data unless we are legally required to retain it.
- **Portability:** Receive your data in a structured, machine-readable format.

5.2. CCPA Rights (California Residents)

California users have the right to:

- **Know:** Request details about the categories and specific pieces of personal data we have collected.
- **Delete:** Request deletion of personal data unless an exception applies.
- **Opt-Out:** Opt-out of the sale of personal data (we do not sell personal data).

- **Non-Discrimination:** You will not face discrimination for exercising your rights.

To exercise these rights, contact us at data@esbhealthcare.com or use the "Data Access Request" form on our website.

6. Data Sharing

We share your data only as necessary with:

6.1. Service Providers

- **OpenAI:** Processes user inputs via their API without storing data.
- **Firebase:** Stores pseudonymized shared chat messages.

6.2. Legal Compliance

- Regulatory authorities or government entities, as required by law.
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7. Data Retention

- **Input Data:** Not stored; transiently processed by OpenAI.
 - **Shared Messages:** Retained in Firebase for a limited period of time, after which they are automatically deleted.
 - **Technical Data:** Retained as long as necessary for analytics and security purposes.
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8. Cookies and Tracking

We use cookies to improve functionality and user experience.

- **CCPA Compliance:** Users can manage cookies via browser settings or opt out of certain cookies in the "Do Not Sell My Information" section (if applicable).
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9. Data Security

We implement robust security measures:

1. Encryption for data in transit and at rest.
2. Role-based access controls for Firebase data.

3. Regular security audits to identify and mitigate risks.
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10. Cross-Border Data Transfers

For users in the EEA, data may be transferred outside the EEA, including to the United States.

- **Safeguards:** Standard Contractual Clauses or equivalent mechanisms are used to ensure compliance with GDPR.
For US users, data is processed and stored in compliance with applicable US laws.
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11. Data Breach Notification

We follow applicable laws regarding data breaches:

- Notify users in the US within 30–45 days as required by state law.
 - Notify EU users and the ICO (if applicable) within 72 hours.
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12. Children's Privacy

Our services are not intended for children under the age of 13. We do not knowingly collect personal information from children. If you believe we have collected such information, contact us immediately.

13. Changes to This Policy

We reserve the right to update this Privacy Policy. Changes will be posted on this page with the "Last Updated" date. Continued use of our services constitutes acceptance of the updated terms.

14. Contact Information

For questions or concerns about this Privacy Policy, contact us at:

- **Email:** data@esbhealthcare.com
- **Address:** 1 Maple Road, Stockport SK7 2DH, GB