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## PRIVACY POLICY

### 1.0 About Your Privacy and This Privacy Policy

**CARELYO** - (“we,” “our,” and/or “us”) values the privacy of individuals who visit or use our platform, and such other platforms we may create from time to time (collectively, our “Platform”). This privacy policy explains how we collect, use, and share information from users of our Platform (“Users, Customers, Patients, Healthcare Providers, Partners).

This Privacy Policy is developed by **SWEDCON18 AB** is in full compliance with the **Nigerian Data Protection Act 2023** and the **Data Protection Act 2012 of Ghana** and other relevant countries in sub-Sahara Africa we operate. In line with these laws, it is our responsibility as a company to bring this policy to the attention of all interested parties and stakeholders that provide us with their personal data. By providing your personal information or data, you acknowledge that we may use it only in the ways set out in this Privacy Policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

This Privacy Policy outlines your rights regarding privacy and details our procedures for collecting, using, storing, and, if required, sharing your personal data as part of our service provision.



Your privacy holds immense importance to us. We dedicate significant thought, effort, tools, and resources toward safeguarding the confidentiality of the information you entrust to us. Committed to the proper handling of personal information (also known as 'personal data' or 'personally identifiable information') gathered through our Platform, this policy comprehensively addresses privacy concerns during your Platform usage.

Please read this Privacy Policy carefully to understand and learn more about our views, policies, procedures, and practices regarding the collection of information and personal information, how we collect, use, share, disclose and protect the personal information that we have obtained. **BY ACCESSING AND USING OUR PLATFORM AND, OR COMMUNICATING WITH US IN ANY MANNER, YOU REPRESENT THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY.**

## **2.0 Definitions:**

For the purpose of this privacy policy

**Country:** When we mention 'country' within this privacy policy, we are specifically referring to Nigeria, Ghana, and other countries within the Sub-Saharan African region unless expressly specified otherwise.

**Personal Data:** refers to any information that pertains to an identified or identifiable individual. This includes all details we collect or retain about users, stakeholders, and other involved parties, whether obtained directly or indirectly. It encompasses online data that can identify a person, such as names, addresses, phone numbers, passport IDs, national identification numbers, usernames, passwords, digital footprints, photographs, and financial information.

**Service Provider:** A data processor refers to any natural or legal person entrusted by the Company to handle data. This includes third-party entities or individuals engaged by the Company to facilitate, provide, or support the Service, perform services associated with it, or aid the Company in analysing Service usage.



**Third-Party Social Media Platforms:** refers to any website or social network website to which a user can log in to assess our Platform.

**CARELYO:** is referred to as either “We” “Us” or “Our” in this Policy.

**You:** These terms encompass patients, doctors, care providers, users, beneficiaries, third-party vendors, agents, healthcare providers, their affiliated firms, and other stakeholders. They represent individuals or entities from whom we collect personal data or instruct to collect and process such data on our behalf.

### **3.0 Our Privacy Principles**

- Personal information provided by you is processed fairly, lawfully, and in a transparent manner.
- The personal information you provide is collected for a specific purpose and is not processed in a way incompatible with the purpose for which we collected it.
- Your personal information is adequate, relevant, and limited to what is necessary in relation to the purposes for which it was collected or further processed
- Your personal information is kept accurate and, where necessary, kept up to date.
- Your personal information is kept no longer than is necessary to achieve the lawful basis for which the personal data was collected or further processed.
- Accurate, complete, and not misleading, and where necessary kept up to date regarding the purpose for which the personal data is collected or further processed.
- Processed in a manner that ensures appropriate security of personal data, including the necessary protection against unauthorized or unlawful processing, access, loss, destruction, damage, or any form of data breach.
- We employ technical and organizational measures to ensure confidentiality, integrity, and availability of technical data.



#### **4.0 What Information we collect use, and disclosure**

For us to provide our services effectively, we may collect, use, and store personal identifiable information, if you choose to provide it during our interaction. We also disclose and collect certain information to third parties if you choose to log in to our Platform using a third-party single sign-in service that authenticates your identity and connects your social media login information (for example Facebook, LinkedIn, Google, Instagram, Twitter, and others) such as your name and email address. Other information we collect may depend on the privacy settings you have set with your social media provider, so please review the privacy policy of the applicable service. It is crucial to note that in addition to the personal information indicated in this Policy, we may also collect any additional information that could be viewed as personal information.

Registration is required to use this Platform. Once a Healthcare Provider has registered with us and subscribed to our Services, the Healthcare Provider can then invite Patients to use their Services.

Healthcare Provider Registration. To register, Healthcare Providers must provide certain information about themselves and their practices including: the Healthcare Provider's name, date of birth, gender, address, email, phone number, mobile number; provider license, company registration, and a government authorized means of identification. We may also collect certain optional information, including middle name or initial, bank account or other payment information and other contact details, picture, and communication preferences.

Patient Registration. Patients must provide certain information, including first name, last name, date of birth, gender, address, email, mobile, work phone, as well as a government authorized means of identification. We may also collect certain optional information, including



middle name or initial, and other contact info, demographic information, billing details, picture, and communications preferences. In addition, the Patient can communicate other health-related information to the Healthcare Provider during a video consultation or in-person which is stored in the healthcare journal via the Platform.

The information we collect may come directly from you or be generated while providing services. For marketing purposes, your consent is required, which you agree to before using the platform, unless specified in this Privacy Policy or mandated by law/professional standards. By registering or submitting personal information, you acknowledge our use of information as outlined in this Privacy Policy.

**Information We Collect Automatically:** We may automatically collect the following information regarding your use of this Platform through cookies, web beacons, and other technologies: your domain name; browser type and operating system; web pages visited; links clicked; your IP address; time and date stamps reflecting the duration of your Platform or Services usage; the referring URL or the webpage that led you to the Platform; and your browser type. This information may be combined with other data we have collected about you, including, where applicable, your username, name, and other personal information. For further details on our use of cookies and other tracking mechanisms, please refer to the '**Cookies and Beacons**' section below. Safeguarding this information is a priority for us. Unless explicitly detailed in this Privacy Policy or upon your request or approval, we will never use or disclose your information.

## **5.0 Purpose for which information is used**

We are committed to ensuring that all information obtained from you is adequate, respecting the inherent dignity of every individual. All information collected from you is processed



exclusively for legitimate and lawful purposes. In adherence to the laws of Nigeria, Ghana, and other sub-Saharan African countries where we operate, the collected information may be utilized for the following purposes:

- To register you as a new customer
- To contact or provide you with information, alerts, and suggestions
- To verify your identity
- To reach out to you, either ourselves or using the appropriate authorities, if we have a good reason to believe that you or any other person may be in danger or may be either the cause or the victim of a criminal act
- To provide you with customer support, and ensure you are receiving quality service;
- To send you reminders and other information related to your care on behalf of your Healthcare Provider
- For billing and transaction processing purposes
- To supervise, administer and monitor our Platform use
- To measure and improve the quality, effectiveness, and delivery of our services;
- To personalize the Platform experience and to deliver content and product and service offerings relevant to individual interests, including targeted offers and ad
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations
- To comply with any legal obligation requiring disclosure of such personal data to any public body
- To comply with applicable local and/or state and federal laws, including, but not limited to laws related to protecting client and public health and safety
- Any other purpose with your consent
- To manage our relationship with you which will include:
  - Notifying you about changes to our terms or privacy policy
  - Asking you to leave a review or take a survey
  - Performance of a contract with you
  - It is necessary for our legitimate interests to keep our records updated and to study how customers use our products/services.



## 6.0 Disclosure to third parties

Information about you will not be disclosed to non-affiliated third parties except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards. This includes but is not limited to the following.

1. **Healthcare Providers:** Healthcare Providers: Patients' information is accessible to their healthcare providers to facilitate personalized healthcare delivery. These healthcare providers, acting as data processors, are obligated to protect and ensure the proper handling of shared data. Our platform facilitates the secure sharing of your information only with the healthcare providers you have signed up with. It is important to note that while this Policy does not specify how healthcare providers will utilize or disclose information obtained during your platform use, you can request details directly from your healthcare provider regarding they handle and treat your information within their practice.
2. **For business purposes:** We may share your information with vendors and service providers, including our data hosting and data storage partners, analytics and vendors providing technology services and support, payment processing, and data security. We also may share information with professional advisers, such as auditors, law firms, and accounting firms.
3. **With your direction or consent:** We may share your information with third parties if you request or direct us to do so. You have the option to withdraw your consent at any time by contacting us at [info@swedcon18.com](mailto:info@swedcon18.com). Please note that your data may be retained for a considerable duration as required by law, government regulations, or any other institution that deems it necessary. Additionally, we may retain data for our own purposes, such as training and learning to enhance and improve the platform.





4. **With affiliates within our corporate group:** We may share your information with any subsidiaries or parent companies within our corporate group;
5. **For advertising:** If you opt-in to the use of targeting cookies and web beacons, information about your Platform activity may be shared with our advertising partners to optimize marketing efforts. Importantly, we do not share any confidential information, such as names, email addresses, phone numbers, etc., with any advertising platform.
6. **Compliance with law:** We may share your information with a court, regulatory body, law enforcement agency, public body, or pursuant to a subpoena, to comply with applicable law or any obligations thereunder;
7. **Business transfers:** In the event of our acquisition, merger with another company, or if a substantial portion of our assets is transferred to another entity, or in the case of our involvement in a bankruptcy proceeding, the information collected from you may be transferred to the acquiring or merged entity.
8. **For other business reasons:** We may share your information to enforce any applicable Terms of Use.
9. **Our service providers:** We work with reputable strategic partners, service providers etc. so they can process your personal information on our behalf. We will only transfer personal information to them when they meet our strict standards on the processing of data and security. We only share personal information that allows them to provide their services.
10. **Preventing Fraud or Crime:** We may disclose personal data to the extent permitted by law, where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or any other criminal activity, situations involving potential threats to the safety of any person, or as evidence in litigation, or to safeguard our sites and platforms.

We only disclose your personal information to third parties who agree to maintain strict confidentiality and use it solely for the specified purpose provided by us. Additionally, certain



personal information may be transferred within or outside Ghana, Nigeria, or sub-Saharan Africa to offshore companies working with or on behalf of our organization, aligned with the purposes described in this Privacy Policy. In all cases where personal data is transferred to a country that is deemed not to have the same standards of protection for personal data as Ghana, Nigeria, and sub-Saharan African countries. We take measures to ensure appropriate safeguards are in place to protect your personal information. These steps may involve imposing contractual obligations on the party receiving the data to maintain adequate standards of protection.

In situations where competent authorities or existing data protection laws are absent in the country where your data is intended to be transferred, we will seek your consent after informing you of potential associated risks.

If the transfer solely benefits you and obtaining consent is impractical, we may proceed without it.

Exceptions where we may transfer your data without prior consent include cases where it's necessary for public interest protection, legal defense claims, or safeguarding your vital interests in situations where you are unable to provide consent due to physical or legal incapacity. **Note:** We may prompt you to share content on our Platform. If you make any information publicly available on our Platform, it can be viewed and utilized by anyone. Consequently, we cannot prevent such information from being used in ways that might violate this Policy, the law, or your personal privacy. Therefore, it is advisable to refrain from posting sensitive information on our Platform that you are uncomfortable sharing publicly, such as personal medical details. Please note, we are not accountable to you or any other individual for any content or information you post on our Platform, or for the use or disclosure of such content or information by other users or third parties.

We will rely on one or more of the following processing conditions and grounds when we collect your personal information:



- **The performance of a contract:** This is when the processing of your personal information is necessary to perform our obligations under a contract or for us to take steps at your request;
- **A legal obligation:** This is when we are required to process your personal information to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- **Legitimate and vital interests:** We may process information about you when it aligns with our legitimate business interests, provided it does not supersede your fundamental rights, freedoms, or interests. Additionally, this process should not be unexpected by you. Our legitimate interests encompass various purposes, including providing information and/or services to platform visitors, preventing fraud or criminal activities, and customizing individuals' online experiences. To protect your vital interest or that of another person.
- **Your consent is given:** We may occasionally request your explicit permission to process certain aspects of your personal information, and we will proceed with such processing only upon your agreement. You have the option to withdraw your consent at any time by contacting us at [info@swedcon18.com](mailto:info@swedcon18.com). Where it is necessary for the performance of a task carried out in the interest of the public or in the exercise of an official public mandate vested in us.

## 7.0 Cookies and web beacons

Cookies are small text files stored on your computer or mobile devices when you visit a website. They serve various purposes, like recording preferences to customize your Platform experience and aiding us in analyzing Platform traffic. Another type, 'user-input' cookies, might be necessary for essential functionality and will not be blocked via notification banners. Your selection will be stored in a cookie for 60 days (about 2 months), and to revoke your choice, clearing your browser's cookies is necessary. A web beacon, a small and often invisible image



or embedded code on a web page or email, tracks user activity. Third parties commonly use it for web analytics, advertising optimization, or page tagging.

Like many platforms, we use 'cookies' and 'web beacons' for information collection. You have the option to modify your browser settings to disallow acceptance of cookies and web beacons (often available in your browser's Tools or Preferences menu) or prompt you before accepting them. Additionally, you can delete cookies from your device at any time. However, please note that declining cookies may limit your access to certain features on our Platform.

We may utilize third-party cookies or web beacons for web analytics, attribution, and error management. Additionally, third-party tools and widgets employed on our Platform serve to enhance functionality. These tools or widgets may place cookies on your device to streamline their services and ensure proper display of your interactions on our web pages.

While cookies themselves do not reveal your email address or personally identify you, our analytical reports may involve obtaining other identifiers, including IP addresses through Vendor services. However, this is solely for gauging the number of unique visitors to our Platform and understanding geographic trends among visitors, rather than identifying individual users.

There may also be the use of cookies and web beacons of services owned or provided by third parties that are not covered by our Privacy Policy and we do not have access or control over these cookies and web beacons.

**BY NAVIGATING ON OUR PLATFORM, YOU CONSENT TO THE PLACEMENT OF THESE COOKIES ON YOUR COMPUTER OR INTERNET-ENABLED DEVICE.**

## **8.0 social media and general information tools**

We utilize various publicly available tools and information exchange resources, including but not limited to blogs, Google, Facebook, Twitter, and others, to enable sharing. Any information you provide or share via these social media platforms is subject to the Privacy Policy of the



respective site, and it may be accessed and collected by both the site and its users. We do not control or hold responsibility for these companies or their utilization of your information. Notably, we hold no liability for the use of your information by any social media platform.

Moreover, our Platforms may include blogs, forums, crowd-sourcing, and other applications, or services collectively known as 'social media features.' These features aim to facilitate knowledge and content sharing. Any personal information you provide within these social media features may be shared with other users (unless specified otherwise at the point of collection), over whom we might have limited or no control.

We may interact with you through various platforms including Facebook, WhatsApp, Twitter, LinkedIn, and Instagram, etc. Please note that any content you post to such social media platforms (e.g., pictures, information, or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile), is subject to the applicable social media platform's terms of use and privacy policies. We recommend that you review this information carefully to better understand your rights and obligations regarding such content.

## **9.0 Phishing**

Online identity theft and account hacking, including phishing, are significant concerns. Always exercise caution when providing your information and ensure it is within our secure system. We will never solicit your login or confidential information through non-secure or unsolicited communication (email, phone, or otherwise). As a result, we do not accept liability for any financial or account loss directly resulting from phishing activities.



## **10.0 Location-based tools**

We may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services that we believe may be of interest to you based on your geographic location and to improve our location-based products and services.

## **11.0 Data Security and information**

Using any internet-based service carries inherent security risks, despite our best efforts, security against all threats can therefore not be 100% guaranteed. Our infrastructure, encryption technology, operation and processes are all designed, built, and maintained to protect personal data from unauthorized loss or access, breaches such as theft, cyberattack, viral attack, manipulation of any kind, misuse, modification, alteration, destruction, or disclosure under our control.

Where we have provided you (or where you have chosen) with a password that grants you access to specific areas on our Platform, you are responsible for keeping this password confidential. We request that you do not share your password or other authentication details (e.g., generated codes with anyone).

You are responsible for maintaining the confidentiality of any password we have given you (or that you have selected) that gives you access to certain parts of our Platform. Please refrain from sharing your password or any other authentication information with anyone, including generated codes. You should take precautions to prevent unwanted access to your password, phone, and computer. This may include signing off after using a shared computer, using a strong password that nobody else knows or can readily guess, and keeping your log-in and password private. We disclaim all liability for any lost, stolen, or compromised passwords, and any account activity arising from unauthorized password use. We take measures to limit access to your personal information to those with a legitimate need. Individuals with data access are obligated to maintain strict confidentiality regarding such information.



We endeavour to retain personal information only for as long as necessary, considering its purpose or until you request its deletion. The duration of data storage is influenced by administrative, legal, or operational requirements. For instance, we might retain your information to comply with legal obligations, settle disputes, or enforce our policies and agreements.

## **12.0 Children's privacy**

We are dedicated to protecting children's privacy and do not knowingly collect personally identifiable information, such as names or email addresses, from children, except where necessary for registering them as dependents related to our customers. However, registration of children under 18 years old, enabling access to healthcare services, requires the explicit consent of an elected guardian.

To verify the age of our users, we typically request government-approved identification. If you have concerns in this regard, please contact us at [info@swedcon18.com](mailto:info@swedcon18.com). We will promptly take necessary and legally permissible actions upon receiving such information.

## **13.0 Your rights**

If we for the purposes set out in this policy processes your personal information, you have the following rights:

- **Access and correction:** you have the right to access your personal information. Provided we establish that we are under obligation to provide personal information to you. Before providing personal information to you, we may choose to ask for proof of identity and sufficient background information about your interaction with us. If any information we hold about you is incorrect, you are entitled to ask us to correct any inaccuracies in your personal information. We will ensure that such corrections are affected within a reasonable time.



- You may request us to update your personal information at any time.
- You may at any time request us to disclose your personal information to a third party. Your request may specify the required format for such disclosure provided we have the capacity to provide the personal information in the required format.
- Object to processing: you have the right to object to the processing of your personal information if we are not entitled to use same anymore.
- You may also have the right to seek that your personal information be deleted if in your opinion such personal information is being kept or collected longer than necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors; for example, according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.
- Right to restriction of processing: In certain circumstances, you are entitled to ask us to stop using your personal information, for example, where you think that the personal information, we hold about you may be inaccurate or where you think that we no longer need to process your personal information.
- The right to withdraw consent: You have the right to withdraw your consent to further use of your personal information.
- Right to Lodge a Complaint with the appropriate authority if you believe that our processing of your personal information violates applicable data protection laws.
- Right to know if we intend to use automated decision making when processing your personal data.
- Request a copy of your personal data in a commonly used electronic format, except to the extent that providing your personal data will impose unreasonable cost on us. In such case we will ask you to bear the some of the cost in providing a copy of your personal data.





#### **14.0 Links to other websites**

Please be aware that our platform may contain links to other websites, services, or offers including sites maintained by third parties that are not governed by this Privacy Policy but by other privacy policies that may differ. We encourage users to review their privacy policies. If you click on a third-party link, you will be directed to that third party's website or service. The fact that we link you to a website or service is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not have control over third-party websites and services, and we do not have control over their privacy policies and terms of use. Please review the privacy policy of each website visited before disclosing any personal information.

#### **15.0 Changes in this policy**

We may modify this Privacy Policy from time to time at our discretion to reflect our current privacy practices as well as the legal, regulatory, and operating environment and such revised versions will automatically become applicable to you.

The date of the last revision of this policy appears at the end of this page. We encourage you to periodically review this page for the latest information on our Privacy Policy and practices. Regardless of changes to our Privacy Policy, we will never use the information you submit under our current Privacy policy in a new way without first notifying you.

#### **16.0 Disclaimer**

By this Privacy Policy, we do not represent or warrant the condition or functionality of our Platform, its suitability for use, nor guarantee that our service will be free from interruption or any error. No liability or responsibility shall lie for risks associated with the use of our Platform,



including but not limited to any risk to your computer, software or data being damaged by any virus, software, or any other file that might be transmitted or activated via our Platform or your access to it. Neither do we guarantee the reliability of information contained on our Platform, particularly those shared by third party users.

### **17.0 Personal Data Breach**

In the event of a breach impacting your stored personal data and posing a risk to your rights and freedoms, as mandated by Section 40(2) of the Nigeria Data Protection Act 2023, we commit to notifying the Commission within 72 hours (about 3 days) of becoming aware of the breach. Our notification to the Commission will include a description of the breach's nature.

Moreover, if a data breach is likely to significantly risk your rights and freedoms, we will promptly inform you. Our communication will provide detailed steps and methods you can take to mitigate any adverse effects resulting from the breach.

### **18.0 Governing Law**

This Privacy Policy is established in accordance with the Nigeria Data Protection Regulation (2019), the Data Protection Act 2012 of Ghana, and similar regulations in sub-Saharan African countries. In cases where any provision within this policy is considered inconsistent with the laws or regulations applicable in Nigeria, Ghana, or other relevant authorities, the overriding law, regulation, or convention shall prevail.

### **19.0 Contact Us**

If you have any questions, comments, or concerns about this Privacy Policy or questions, comments, or requests about our administration of your personal information, please contact us at [info@swedcon18.com](mailto:info@swedcon18.com). We will respond within a reasonable time.