Avline Health Ltd customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- How to complain

Contact details

Email

avlinehealth@gmail.com

What information we collect, use, and why

We collect or use the following information **to provide patient care, services, pharmaceutical products and other goods**:

- Name, address and contact details
- Gender
- Pronoun preferences
- Date of birth
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, medication and dietary requirements and general care provisions)
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)
- Payment details (including card or bank information for transfers and direct debits)
- Records of meetings and decisions
- Call recordings

We also collect the following special category information **to provide patient care, services, pharmaceutical products and other goods.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Genetic information
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following information **for safeguarding or public protection reasons**:

- Name, address and contact details
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Relevant information from previous investigations
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)
- Records of meetings and decisions

We also collect the following special category information **for safeguarding or public protection reasons.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Genetic information
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following personal information **for patient app or portal functionality**:

- Names and contact details
- Addresses
- Medical history
- Payment details
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We also collect the following special category information **for patient app or portal functionality.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Genetic information
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following personal information **to comply with legal requirements**:

- Name
- Contact information
- Health and safety information
- Any other personal information required to comply with legal obligations
- Safeguarding information

We also collect the following special category information **to comply with legal requirements.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Genetic information
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following personal information **for information updates, marketing or market research purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Website and app user journey information
- IP addresses
- Personal information used for administration of the research
- Personal information used for the purpose of research
- Personal information used for medical investigations
- Records of consent, where appropriate

We also collect the following special category information **for information updates, marketing or market research purposes.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Genetic information
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Purchase or service history
- Call recordings
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect the following special category information **for dealing with queries, complaints or claims.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Genetic information
- Health information
- Sex life information
- Sexual orientation information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **to provide patient care, services, pharmaceutical products and other goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests - we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - Avline Health through its flagship product, PelviBiome™, processes limited personal and health information in order to safely deliver vaginal microbiome testing and related healthcare services. Why the Processing is Necessary? To provide PelviBiome™, we must collect identifying information (such as name, date of birth, and contact details) to: - Confirm the identity of the individual receiving care - Ensure test kits and results are securely delivered to the correct person - Communicate clinically important information - Maintain accurate medical and service records - We must also process relevant health information (including symptoms, medical history, and microbiome test results) because: - Laboratory analysis requires linking biological samples to the correct individual - Clinical interpretation depends on understanding reported symptoms and history - Safe, appropriate recommendations cannot be made without contextual health data - Healthcare services must meet professional and regulatory standards for record-keeping Without processing this information, PelviBiome™ would not be able to deliver accurate, safe, or personalised healthcare services. Legitimate Interest Our legitimate interest is to operate a safe, effective vaginal microbiome testing service that improves patient understanding, supports clinical decision-making, and reduces uncertainty around recurring or unexplained symptoms. This includes: - Delivering scientific insight that may not be available through standard screening - Supporting earlier identification of microbiome imbalance - Suggest more targeted and appropriate pathways - Improving service quality, safety, and users outcomes Where special category health data is processed, this is carried out under Article 9(2)(h) UK GDPR for the provision of healthcare, and where required, explicit consent is obtained. Benefits of Processing Collecting and using this information provides clear benefits to individuals: - Greater clarity about potential drivers of symptoms - More

personalised and evidence-informed care - Reduced reliance on repeated empirical treatments - Improved ability to track health changes over time - Better-informed conversations with healthcare professionals The broader benefit includes contributing to improved understanding of vaginal microbiome health, which may support service improvement and public health knowledge. Balancing Benefits Against Risks We recognise that health data is sensitive and that individuals have a strong interest in privacy and confidentiality. We do not prioritise business needs over individual rights. To ensure fairness and proportionality: - We collect only the minimum data necessary for the stated purpose - We do not use health data for unrelated marketing purposes - Access is restricted to authorised personnel and regulated partners - Data is protected through encryption, secure systems, and confidentiality obligations Individuals can exercise their rights at any time Processing is transparent and clearly explained before participation The anticipated benefits — improved clarity, safer care, and more targeted health decisions — are substantial and directly aligned with the individual's expectations when registering for a health testing service. Given the safeguards in place, the processing is proportionate, necessary, and unlikely to cause unwarranted harm or override the rights and freedoms of the individuals concerned.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **for safeguarding or public protection reasons** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - The processing of identifying information (such as name, date of birth, and contact details) is necessary to: Confirm the identity of the individual receiving the test Link laboratory samples to the correct person Deliver results securely and confidentially

Communicate clinically relevant information Maintain accurate healthcare records in line with professional standards The processing of health information (including symptoms, medical history, and microbiome results) is necessary because: Laboratory findings cannot be interpreted safely without clinical context Personalised insights depend on understanding symptom history Appropriate next steps or recommendations require relevant health data Healthcare services must meet regulatory and duty-of-care obligations Without this information, PelviBiome™ would not be able to provide accurate results, ensure patient safety, or deliver meaningful clinical insight. Why It Is Legitimate The processing is legitimate because it is directly connected to the provision of healthcare services requested by the individual. Our legitimate interest is to: Provide microbiome testing and associated health insights Improve clarity around potential drivers of symptoms Support more informed and targeted healthcare decisions Operate a safe, regulated, and effective diagnostic service Where health data (special category data) is processed, this is carried out under Article 9(2)(h) UK GDPR for the provision of healthcare, and where appropriate, explicit consent is obtained. The processing is proportionate, limited to what is necessary, and carried out with appropriate safeguards. Individuals would reasonably expect their information to be used in this way when accessing a diagnostic health service. Appropriate technical and organisational measures are in place to protect confidentiality and minimise risk.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **for patient app or portal functionality** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - Necessity Processing identifying information (such as name, date of birth, and contact details) is necessary to: Verify the identity of the individual receiving the service Correctly link laboratory samples to the appropriate person Deliver test kits and results securely Communicate important clinical or service information Maintain accurate healthcare records in line with regulatory obligations Processing health information (including symptom history and microbiome test results) is necessary because: Laboratory data cannot be safely interpreted without clinical context Personalised insights require relevant health background Appropriate recommendations depend on understanding reported symptoms Healthcare providers have professional and legal duties to document care appropriately Without processing this information, the service could not operate safely, accurately, or in compliance with healthcare standards. Legitimacy The processing is legitimate because it is directly connected to the provision of healthcare services requested by the individual. Individuals would reasonably expect their information to be used in this way when registering for a diagnostic health service. Our legitimate interest is to: Deliver microbiome testing and related health services Provide clinically meaningful insights Improve service safety and effectiveness Meet regulatory and professional healthcare obligations Where special category health data is processed, this is done under Article 9(2)(h) UK GDPR for the provision of healthcare, and explicit consent is obtained where required. The processing is proportionate, limited to what is necessary, and supported by appropriate technical and organisational safeguards to protect confidentiality and individual rights.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - Why the Processing Is Necessary As a provider of healthcare-related testing services, we are subject to legal and regulatory requirements that require us to: Maintain accurate medical and service records Demonstrate traceability of laboratory samples and results Comply with health and safety obligations Meet medicines, diagnostics, and consumer protection regulations Respond appropriately to complaints, incidents, or regulatory enquiries Prevent fraud and misuse of services Comply with financial, tax, and accounting obligations To meet these requirements, we must process identifying information (such as name, contact details, and date of birth) and, where relevant, associated health information linked to the service provided. Without processing this information, we would be unable to demonstrate compliance, ensure patient safety, or meet statutory record-keeping and accountability obligations. Why the Processing Is Legitimate Our legitimate interest is to operate a lawful, safe, and accountable healthcare service in accordance with UK law and professional standards. Complying with legal and regulatory requirements: Protects patients by ensuring traceability and clinical accountability Enables safe investigation of incidents or adverse outcomes Supports regulatory oversight and public trust Prevents misuse, fraud, or unlawful activity Ensures transparency and financial compliance This processing aligns with what individuals would reasonably expect when engaging with a regulated health service. Balancing Test We recognise that personal and health information is sensitive. To ensure fairness and proportionality: We collect only the minimum information required to meet legal obligations We do not use this information for unrelated purposes Access is restricted to authorised personnel Appropriate technical and organisational safeguards are in place Information is retained only for legally required periods The benefits of complying with legal and regulatory obligations — including patient safety, accountability, and lawful operation — outweigh the limited and controlled impact of processing this information. The processing is proportionate, necessary, and does not override the rights or freedoms of the individuals concerned.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **for information updates, marketing or market research purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - Why the Processing Is Necessary We may process limited personal information (such as name, email address, service interaction history, and general engagement data) to: Provide updates about PelviBiome™ services, availability, and improvements Share relevant educational information about vaginal microbiome health Notify individuals about early access, new services, or related products Conduct customer satisfaction surveys Carry out market research to understand patient needs and improve service design Without processing this information, we would be unable to keep interested individuals informed, evaluate service quality, or ensure that our communications and services remain relevant and patient-focused. We do not use sensitive health data for direct marketing without explicit consent. Why the Processing Is Legitimate Our legitimate interest is to: Maintain appropriate communication with individuals who have engaged with our service Provide relevant and expected updates about healthcare services Improve patient experience and service safety through feedback and research Develop services that better meet patient needs Individuals who register interest in PelviBiome™ would reasonably expect to receive relevant updates and service communications related to their enquiry or participation. Balancing Test We recognise the importance of privacy and ensure that our interests do not override individuals' rights and freedoms. To ensure fairness and proportionality: We only process limited contact and engagement

information for these purposes We do not sell personal data to third parties We do not use special category health data for marketing without explicit consent Individuals can opt out of marketing communications at any time Communications are relevant, proportionate, and not excessive Data is protected through appropriate technical and organisational safeguards The benefits of keeping individuals informed, improving healthcare services, and conducting responsible market research are balanced against minimal privacy impact. Individuals retain full control over their marketing preferences. The processing is proportionate, transparent, and aligned with reasonable expectations.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - Why the Processing Is Necessary To investigate and respond effectively, we may need to process identifying information (such as name, contact details, order history, and service interaction records) and, where relevant, associated health or testing information. This processing is necessary to: Verify the identity of the individual raising the query or complaint Review service records and laboratory data Provide accurate explanations or clarifications Investigate concerns relating to safety or quality Resolve disputes fairly and efficiently Defend or pursue legal claims where required Comply with regulatory or professional obligations Without access to this

information, we would not be able to properly assess concerns, ensure accountability, or respond in a fair and informed manner. Why the Processing Is Legitimate Our legitimate interest is to: Provide a safe, transparent, and accountable healthcare service Ensure service quality and continuous improvement Protect patients and the organisation from harm or misinformation Comply with legal and professional standards Establish, exercise, or defend legal rights where necessary Individuals would reasonably expect that, if they raise a concern or complaint about a healthcare service, relevant information will be reviewed in order to investigate and resolve the matter. Balancing Test We recognise that personal and health information is sensitive and handle it accordingly. To ensure fairness and proportionality: We only access information that is directly relevant to the query or complaint Access is restricted to authorised personnel Information is handled confidentially and securely Records are retained only for appropriate and lawful periods Individuals retain their data protection rights throughout the process The processing is proportionate and limited to what is necessary to resolve concerns responsibly. It does not override the rights and freedoms of the individuals concerned.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- **Public task** – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where we get personal information from

- Directly from you

How long we keep information

[3] years after last action.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or
- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the Public Benefit and Privacy Panel for Health and Social Care or other similar governance and scrutiny process.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint