PRIVACY POLICY

Komodo Monitr Ltd. ("us", "we", or "our") operates, komodowellbeing.com, subdomains and the Komodo mobile application (hereinafter referred to as the "Service").

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Definitions:

Service

Service means the komodowellbeing.com site, sub-domains and the Komodo mobile application operated by Komodo Monitr Ltd.

Personal Data

Personal Data means data about a living individual who can be identified from that data (or from that and other information either in our possession or likely to come into our possession).

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small files stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected:

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

Google Sign-In (SSO)

Komodo Wellbeing, operated by Komodo Monitr Ltd., offers Google single sign-on (SSO) so that users can sign in to their existing Komodo account using their Google account.

Information accessed and used

Our Google sign-in permissions allow us to receive your Google account identifier and basic profile information, including your full name, given name, family name and profile image URL, plus the OpenID Connect authentication information.

We use your Google account identifier to authenticate you and link your Google identity to your Komodo account. We do not use the name fields or profile image URL. Our Google integration is used solely for sign-in.

Email addresses associated with Komodo accounts are supplied separately during account provisioning, rather than obtained through Google sign-in.

Information stored

Of the information received through Google sign-in, we store only your Google account identifier. Other personal information supplied separately to Komodo is covered by the relevant sections of this privacy policy.

Contact and deletion requests

For questions about Google sign-in information, or to request its deletion, contact support@komodowellbeing.com

Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service with a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Location Data

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customise our Service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

Use of Data

Komodo Monitr Ltd. uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

Use of User Data

Subject to the following paragraph, the Customer and/or the User shall own all right, title and interest in and to all of the User Data and shall have sole responsibility for the legality, reliability, integrity, accuracy and quality of the User Data.

Komodo Monitr Ltd. shall own all right, title and interest in and to all Anonymous User Data. Anonymous User Data means User Data from which the individual's name date of birth, organization and other unique identifiers have been removed, and from which the individual cannot reasonably be identified.

Anonymous User Data may be used in the following ways:

- To amalgamate it with other user's anonymous data for benchmarking purposes for use in the service, or in educational material such as blogs;
- Research purposes;

The Customer agrees that Komodo Monitr Ltd. may repurpose any Anonymous User Data for any purpose without restriction and that the Customer, User and /or Authorized User shall have no interest in such Anonymous User Data or in the proceeds of any sale, license, or other commercialization of such information.

Children

Children under age 18 may not create their own account with the Service. Accounts for minors are administered by the organization administrator. Your Organization's Administrator is responsible for receiving consent from a Minor's parent or guardian prior to creating an account for that Minor.

Personal Health and Medical Information & Communications

If you choose to use the communications module of Komodo Monitr, you hereby certify that only administrators and staff of that organisation will have access to the module along with users. For each organisation on Komodo Monitr, the super administrator will choose whether to enable access to this module. Within this module, personal health and medical information may be collected and stored along with communication between users and administrators as well as staff. It is the responsibility of the organisation using Komodo Monitr to administrate communications between the users.

A user has the right to refuse that you track their personal health and medical information, or to cease tracking and delete their personal health and medical information at any time. Users

may also request that these changes be made by Komodo Monitr Ltd. by emailing support@komodowellbeing.com.

Legal basis for processing personal data under the General Data Protection Regulation (GDPR). If you are from the European Economic Area (EEA), Komodo Monitr Ltd. legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Komodo Monitr Ltd may process your personal data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- For payment processing purposes
- To comply with the law

Retention of Data

Komodo Monitr Ltd. will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

Komodo Monitr Ltd. will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

Transfer of Data

All Komodo Monitr data is hosted on the Google Cloud servers in the United States of America or Frankfurt, Germany (by customer choice). Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside of the United States of America or Frankfurt, Germany and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States of America or Frankfurt, Germany and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Komodo Monitr Ltd. will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

Disclosure for Law Enforcement

Under certain circumstances, Komodo Monitr Ltd. may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Komodo Monitr Ltd. may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Komodo Monitr Ltd.
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your Data Protection Rights under the General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Komodo Monitr Ltd. aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:
The right to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your

account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
The right to object. You have the right to object to our processing of your Personal Data.
The right of restriction. You have the right to request that we restrict the processing of your personal information.
The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
The right to withdraw consent. You also have the right to withdraw your consent at any time where Komodo Monitr Ltd. relies on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service Providers

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: https://policies.google.com/privacy?hl=en

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third-party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Children's Privacy

Should you choose to collect data on a person under the age of 18 years, you do so at your own discretion and warrant that you have sought the appropriate parental consent to do so.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us: By email: contact@komodowellbeing.com

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