

PRIVACY POLICY

Version number: 1.1
Effective date: 28- March -2025

1. Who are we?

1.1 We are Thriive App Ltd. For privacy queries, you can contact us at contact@senvi.app.

2. What's the purpose of this policy?

2.1 It tells you what to expect when we collect personal information from users of our website/app. Please only use them if you are completely happy with this policy.

2.2 Generally, the policy covers only information provided to us. If you give personal information to other people, such as payment providers or other websites, please check their privacy policies.

3. Might the policy change?

3.1 Yes. We will give you notice of the new version by posting it on our service and communicating it otherwise if appropriate.

4. What do we collect?

4.1 Information that you upload to our service or otherwise give us such as:

- your name and contact details;
- other information you provide on registration or otherwise such as your age, gender, height, weight and other health information;
- account information such as your username and password and your contact or other account preferences;
- details about your transactions on our service;
- your friend's information if you use our "refer a friend" or similar service;
- information that you include in communications with us including surveys and feedback; and
- contact or other information which you give or allow us to use for newsletters or other marketing.

4.2 Some of this information will be "special category data", such as details relating to your health.

4.3 Automated browsing information about your use of our service such as: the internet protocol (IP) address used to connect your device to the internet, connection information such as browser type and version, information about your device including device-type and device identifier, operating system

and platform, mobile network data, a unique reference number linked to the data you enter on our system, the site from which you arrived at our service, details of your activity with date/time stamps including pages you visited and your searches/transactions.

4.4 We may receive limited information about you from our payment/authentication providers (for verification purposes) or from other companies if you log in via social media/other websites. This information may include your name and contact details.

5. What's our reason/legal basis for collecting the information?

5.1 Because it's necessary to take steps at your request to enter into a contract with you and/or to perform such a contract. This applies to information such as initial enquiries and to account, contact and transaction information.

5.2 Because it's in our "legitimate interests", e.g., sending you marketing communications about our similar products/services, managing and improving our service including tracking usage patterns and preventing or detecting fraud or abuse. This applies to information such as contact details, automated browsing data as well as to "refer a friend" contact details and to surveys and feedback.

5.3 Because you've specifically agreed on our service (e.g., by selecting a consent box). This applies to "special category data" (explained above) and it may apply to contact or other information that you specifically agree to us using for certain kinds of marketing. You can withdraw permission at any time as explained on our service or by emailing us at the above email address.

5.4 Because it's necessary to comply with legal or regulatory obligations.

6. How long do we keep personal information?

6.1 We will generally hold your information for our default standard retention period of six years after the end of our contract with you, but we may delete it earlier/later as set out below or in our terms and conditions.

6.2 We will keep your information that we use for email newsletters or other marketing until you tell us to stop sending you such messages.

6.3 We will generally keep automated browsing information for up to 14 months.

6.4 We will keep friend referral contact information that you supply us for up to 6 months.

- 7. To whom do we send or make available your personal information?**
 - 7.1 To other people who supply us with services, e.g., website/app hosting and management, app admin, payment, email distribution, e-commerce, online advertising, analytics, social media, etc.
 - 7.2 To other users of our service if you opt to include your details (first name and photo) in our leaderboard.
 - 7.3 To regulators, the police and other law enforcement or official authorities to help deal with fraud and abuse and/or comply with legal requirements and/or to protect us or others.
 - 7.4 To insurers and professional advisers in connection with our insurance cover or to deal with legal claims.
 - 7.5 To (actual or potential) buyers so far as reasonably necessary in the case of a proposed or completed sale or merger or business combination involving all or the relevant part of our business.

- 8. Do we send your information outside the UK?**

- 8.1 Your personal information (e.g., name, username, contact details, IP address, browsing information) is transferred to companies outside the UK (generally to the US) that provide us with the services mentioned above (see: *To whom do we send or make available your personal information?*). Where this happens, we will ensure that there is a legal basis to do so, for example in accordance with “adequacy regulations” applying to particular countries, (e.g., the “UK-US Data Bridge” if applicable) or under contracts with standard contractual clauses sanctioned by the Information Commissioner that are designed to provide adequate safeguards for your personal information.

- 9. What rights do you have?**

- 9.1 If the legal requirements are met: To ask us for access to your personal information, to rectify it if there are mistakes, to delete it or restrict its use in certain circumstances or to “data portability” or to withdraw any consent you’ve given (e.g., marketing).
 - 9.2 You may also have the right to object to use of your personal information in certain circumstances.
 - 9.3 If you have a complaint about how we are dealing with your personal information, please contact us via the email address above. If you are not happy with our response or think we are not handling your personal

information in accordance with the law, you have the right to complain to the Information Commissioner's Office (ICO).

- 9.4 For more information about your rights, visit the ICO's website: www.ico.org.uk.

10. What about cookies?

- 10.1 For information about our use of cookies and similar technologies, please see our [Cookies Policy](#).