

At ReadcoreLab LTD, we care about your privacy. Our Privacy Policy, along with our Terms and other related documents, explains how we handle your personal data. It also provides information on how you can access this data.

1. Purpose of this Policy

ReadcoreLab LTD offers access to our online and mobile services, known as No Insomnia Lab. This includes the No Insomnia Lab website (noinsomniab.com) and its subdomains. We refer to this entire system as the “System.”

2. Processing your data

Purpose of Data Processing

Our goal in processing your data is to provide you with personalized tools for managing insomnia symptoms.

Legal Basis for Processing

Before we process your data, we require your consent. You have the right to withdraw your consent at any time.

Data Collection

Personal Information

We collect and use personal information, such as your name, email address, gender, country, city, state, and age range. This information is used to customize the program and communicate with you. You have the option to opt out of receiving external communications, such as emails and push notifications.

Health Information

To tailor our program to your needs, we collect information about your symptoms, including self-reported data. Additionally, we may gather general information about your mental and physical well-being to track your progress towards the goals you have set for yourself

Electronic identifiers

We may collect information about the devices you use to access the System, including (but not limited to) IP address, mobile device UDID and IMEI numbers, operating system, browser type, and screen size. This information is used to provide you with customer support, for system administration, to tailor your experience of the System, to report aggregate information internally, and to assist communication (e.g., push notifications).

Cookies

To enhance your experience with the System, we may use cookies, which are small text files managed by your web browser. These cookies allow us to recognize you when you return to

the System, keep your entered data across multiple sessions, and store information about your personal preferences.

You have the option to refuse cookies by adjusting your device settings. However, please note that disabling cookies may limit your access to certain parts of the System. Unless you have specifically configured your browser to reject cookies, our system may issue cookies when you visit the System.

Non-identifiable Information

Non-Personal Information refers to any information that does not directly or indirectly identify you. We may include your data in aggregated data sets that are shared with our research partners. In these sets, your data is anonymized and cannot be personally identified. It is used to support generalized statements, such as analyzing the improvement of insomnia symptoms in specific demographics.

Usage Data

The System automatically collects certain information, known as Usage Data. This includes behavioral data, such as the number of completed sessions and the techniques practiced. It also includes details such as IP addresses, request times, response statuses, country of origin, browser features, and device information. This data helps us analyze user behavior within the System and improve its functionality.

3. Data Access

We value the privacy and confidentiality of your identifiable health information. We have implemented policies, procedures, and safeguards to ensure its protection from improper use and disclosure. We are committed to never selling or renting your information.

The following categories outline how we use your identifiable health information and the limited circumstances in which we may disclose it to external entities. While not every use or disclosure is listed, all permitted uses and disclosures fall within these categories. Some uses and disclosures may require your specific authorization.

We do not disclose personal information to third parties for purposes significantly different from the original collection purpose(s).

Disclosure upon Request

If you request it, we may disclose information related to your use of the System. In some cases, written authorization from you may be required for this disclosure.

Payment

We do not store credit card or customer details with any third parties, except trusted suppliers who assist us in delivering System services. We ensure that all suppliers meet our security and data protection standards.

Services and Operations

We may use and disclose your identifiable health information to provide services and for internal operations, such as administration, eligibility, planning, analytics, and activities aimed at improving the quality and cost-effectiveness of the services we deliver. Examples include using your information to enhance service quality, conducting satisfaction surveys, de-identifying health information, providing customer support, and conducting internal training

Emails

When you open an email from us or click on a link in an email (if your computer supports this feature), we may receive a confirmation. This confirmation helps us make our emails more interesting and helpful. If you receive an email from us and wish to stop receiving further emails, you can unsubscribe by following the instructions provided. However, please note that opting out of email communications may limit program reminders and other valuable content.

Reminders and Notifications

We may use and disclose your identifiable health information to send you reminders or notifications related to your interactions with the System. You have the flexibility to customize the format and frequency of these reminders or cancel them altogether. You can make these changes by logging into your account in the App or accessing the notification settings on your mobile device.

Third-Party Service Providers

We engage third-party service providers to support various functions within our organization. These providers may include accounting services, server hosting and email delivery, business associates, vendors, and reputable companies in the industry that subcontract to us or our corporate customers. In compliance with the law, we may disclose your identifiable health information to these service providers to enable them to perform their required tasks. We ensure the protection of your identifiable health information by implementing appropriate contracts or written agreements.

Third-Party Medical Professionals

With your explicit permission, we may share your identifiable health information with third-party medical professionals whom you have nominated.

Threat to Health or Safety

If there is a serious threat to your health and safety or the health and safety of the public or another person, we may use and disclose your identifiable health information as necessary to prevent the threat. However, such disclosure would only be made to individuals who can help mitigate the threat. As required by law

Certain laws permit or require certain uses and disclosures of identifiable health information for example, for public health activities, health oversight activities and law enforcement. In these instances, we will only use or disclose your identifiable health information to the extent the law requires.

Research and Publicity

We may utilize de-identified health information for both internal and external research and publicity purposes. This may involve sharing aggregated information about our users, such as the improvement of symptoms in specific demographic groups. These efforts contribute to public health information and academic research.

Analytics & Marketing

To monitor and analyze web traffic and user behavior, we employ several third-party services, including:

- Google Analytics: We use Google Analytics to gain insights into traffic to and from our website and apps. You can find their privacy policy [here](#).
- Facebook Analytics: Facebook Analytics helps us understand the traffic originating from our Facebook platform and Facebook ads. You can find their privacy policy [here](#).
- TikTok Analytics: We utilize TikTok Analytics to gain insights into traffic from our TikTok platform and TikTok ads. You can find their privacy policy [here](#).
- Amplitude: Amplitude helps us analyze user behavior on our website and apps. You can find their privacy policy [here](#).
- Vero: Vero is used to manage our email newsletter service and collect feedback from app users. You can find their privacy policy [here](#).
- Segment: Segment is a tag management service that assists in tracking behavioral data for other third-party service providers. You can find their privacy policy [here](#).

Transfer of Business Assets

In the event of a business or asset sale, we may disclose your personal data to prospective sellers or buyers. If a third party acquires the System or a substantial portion of its assets, customer personal data will be one of the transferred assets. We ensure that any information transferred to third parties is used in accordance with our privacy principles, and we remain responsible for onward transfers to third parties.

4. Data Storage

We ensure the secure storage of all your personal information on our servers. In certain cases, for a faster user experience, we may store some data on your device.

If you have chosen a password to access specific parts of our App, it is your responsibility to keep this password confidential and not share it with anyone.

We do not store any credit or debit card information.

To send communication emails to our users, we may process some of your data with third parties who utilize software platforms with servers located outside of the US, UK, or EEA. However, we always adhere to data protection laws and implement strict safeguards.

5. Your Rights

As a user of the System, you have specific rights regarding your information.

Right to Access

You have the right to view all personal information collected about you and request disclosure of this data. To receive this information, please contact our Security, Privacy, and Compliance Officer at support@noinsomniab.com. The first copy of this information will be provided free of charge in a portable/common electronic format, such as a CSV file.

Right to Accuracy

You have the right to ensure the accuracy of the data stored in our system. In most cases, you can directly modify your own information through the system. However, if there is incorrect data that you are unable to change, please reach out to our Security, Privacy, and Compliance Officer at support@noinsomniab.com, and we will work with you to update the information.

Right to Deletion

Subject to any legal exemptions, you have the right to request the deletion of all data within the system. To request the deletion of your data, please contact our Security, Privacy, and Compliance Officer at support@noinsomniab.com. In most cases, we will complete this request within 30 days. If there are circumstances that require a delay in deletion, we will notify you directly and provide an explanation for the delay. Please note that in certain cases, legal requirements may necessitate retaining your data. If this is the case, we will inform you directly.

Consent Withdrawal

System users are entitled to revoke their consent at any time by reaching out to the Security, Privacy, and Compliance Officer. It's crucial to note that the absence of consent for data processing renders us incapable of providing program services.

Disclosure Notification Rights

In addition to the right to request disclosures of your data specified in the "right to access" above, we will notify you as required by law if there has been a breach of the security of your identifiable health information.

Concerns or complaints

If you believe that any of your rights with respect to your or others' identifiable health information have been violated by us, our employees or agents, please communicate with the Security, Privacy, and Compliance Officer.

6. Amending this Policy

We reserve the right to revise this Policy without notification. Any changes or updates will be effective immediately upon posting. Your continued use of the System constitutes your agreement to abide by the Privacy Policy as changed. Under certain circumstances (for

example, if we expand the ways in which we use your personal information beyond the uses stated in our Privacy Policy at the time of collection), we may also elect to notify you of changes or updates to our Privacy Policy by additional means, such as by sending you an email.

Questions relating to revisions to this Policy may be addressed to the Security, Privacy, and Compliance Officer.

7. Who can you contact?

Security, Privacy, and Compliance Officer

Privacy, and Compliance Officer (and Data Controller) can be reached at support@noinsomniab.com

8. Effective Date

This Policy is effective as of May 28, 2024.