



PRIVACY POLICY

1. Data Controller

The controller of personal data is:

Wellsi sp. z o.o. headquartered in Kraków, ul.Praska 34b/68, entered in the National Court Register under number 0001056762, NIP: 6762650863, REGON: 526321122, hereinafter referred to as "**Wellsi**" or "Controller".

2. Scope

This Policy applies to:

- a. visitors of www.wellsi.app
- b. patient platform users
- c. specialist platform users
- d. participants of the partner program
- e. persons contacting Wellsi via email, chat, or other channels

3. Categories of Data

3.1. Visitors

Technical data: IP addresses, device IDs, logs, and activity data

Contact data: submitted via chat

3.2. Users-Patients

Contact data: name, e-mail, phone number, account data

Health data: questionnaires, wellbeing data, exercise statistics, chat content.

Technical data: IP addresses, device IDs, logs, and activity data

3.3. User-Specialist

Contact data: name, e-mail, phone number, account data, billing data.

Professional data: qualifications, licenses, liability insurance.

Technical data: IP addresses, device IDs, logs, and activity data

4. Purposes & Legal Bases

4.1 Service delivery

Purpose:

- Creating and maintaining an account
- Access to functionalities
- Enabling collaboration with a specialist

Legal base:

Art. 6(1)(b) GDPR – Service delivery

4.2 Health data

Purpose:

- Program personalization
- Implementation monitoring
- Enabling specialist support

Legal base:

Art. 9(2)(a) GDPR – explicit consent

The user may withdraw consent at any time.

4.3 Chat communication

Purpose:

- enabling contact
- user support

Legal base:

Art. 6(1)(b) & 9(2)(a) GDPR

4.4 Security & development

Purpose:

- Protection against abuse
- Improving service quality
- Aggregated analytics

Legal base:

Art. 6(1)(f) GDPR – legitimate interest

5. Specialist-Patient Relationship

5.1 Specialists' access to the data

The specialist assigned to a user through the "My Team" functionality can access the user's data only through the Wellsi platform environment.

The scope of visible data may include:

- User identification data
- Health survey results

- Program implementation statistics
- Program activity history
- Chat communications within the platform

Access is limited to users assigned to the given specialist.

5.2 The nature of specialist access

The specialist's access is limited to **viewing data within the platform's functionality**.

The specialist does not receive data in the form of data sets or databases.

The data remains within the Wellsi system infrastructure.

5.3 Restrictions on processing by a specialist

The Specialist is not authorized to process user data outside of the platform environment.

In particular, the Specialist may not:

- copy data outside the platform
- export data
- record data in external systems
- create user databases based on the platform
- transfer data to third parties
- use data for purposes unrelated to the platform's functionalities

5.4 Data processing outside the platform

User data may only be used outside the platform if:

- the user voluntarily shares the data with a specialist outside the platform
- there is a separate legal basis for such action
- a separate legal relationship is established between the user and the specialist

Such activities are not covered by the Wellsi service.

5.5 The Role of Wellsi

Wellsi provides the technological infrastructure that enables users to collaborate with specialists. Wellsi is not a party to the therapeutic relationship between the user and the specialist.

6. Data recipients

Data may be entrusted to entities providing services to Wellsi, such as:

- hosting and IT infrastructure providers
- payment processors
- IT security service providers
- communication tool providers used on the platform

These entities process data solely on the basis of data processing agreements and in accordance with the Controller's instructions.

7. Transfers outside EEA

If data is transferred outside the European Economic Area, appropriate safeguards are applied, in particular: Standard Contractual Clauses (SCCs), decisions confirming the adequacy of the level of protection.

8. Data retention periods

Data is stored:

- for the duration of your account use
- until you withdraw your consent to the processing of your health data
- for the period required by law
- until the statute of limitations for claims expires

After deleting your account, your data may be stored in an anonymized form for statistical purposes.

9. Data security

Wellsi employs appropriate technical and organizational measures, including:

- transmission encryption (SSL/TLS)
- role-based access control (RBAC)
- least-privilege principle
- data access logging
- security testing
- incident response procedures

10. User Rights

The user has the right to: access data, rectify data, delete data, restrict processing, port data, object to processing, withdraw consent, file a complaint to the President of the Personal Data Protection Office.

11. Automated Decisions

Wellsi does not make decisions with legal consequences solely through automated means. System recommendations are for supporting purposes only.

12. Voluntary provision of data

Providing your data is voluntary, but necessary to use the platform's functionalities. Refusal to consent to the processing of your health data prevents you from using the features that require such data.

13. Contact

Privacy contact: dpo@wellsi.app

14. Policy Updates

This Policy may be updated. The current version is available on the platform..

Prepared by: Legal Department of Wellsi sp. z o.o., 2026