

MiiCare Privacy Policy

Last Updated: 25th August 2020

Please read this privacy policy carefully, as once you use our MiiCube and associated devices and Service you will be deemed to have read and accepted it.

Introduction

MiiCare Ltd ('MiiCare') has created this Privacy Policy to inform you how it manages, collects, processes and uses your Personal Information (as defined below). If you do not agree with the data practices described in this Privacy Policy, you should not use Our Services. This Privacy Policy further applies to the use of Our subscription service, including use of Our associated mobile applications. Read this Privacy Policy carefully. For the purposes of this Privacy Policy, "We", "Us" and "Our" means MiiCare.

About MiiCare

MiiCare provide a Device (the MiiCube) along with a range of Accessories that are used to monitor the wellbeing of the VIP and provides access to the data and alerts to approved Subscribers through a cloud based Application accessible through an internet browser or smart phone . For the purpose of this Privacy Policy MiiCare is the data controller and its address is 70 Wilson Street, London, EC2A 2DB. You can contact Us by writing to us at this address or emailing us at contact@miicare.co.uk.

We collect information from the VIP and the Subscribers through our website, Device, Accessories and Application.

We reserve the right to review and revise this Privacy Policy. Any changes made to the Privacy Policy will appear here. If We make material changes to this Privacy Policy, We will notify you before they take effect either through the Site or by sending you a notification through Our Application. By making use of Our Services you acknowledge you have read and understood this Privacy Policy.

Collection of Personal Information

Definition of Personal Information

This refers to any information about an individual from which that person can be identified, whether directly or indirectly, including information, such as the individual's name, e-mail, address, phone number, and other information about the individual ('Personal Information').

What Personal Information do We collect about you?

Onboarding Details: You will be asked to provide Us with certain details about you such as your first name, last name, email address, gender, date of birth, physical address, business address. If family member is buying the Services on your behalf, they have to confirm that they have your consent to provide your Personal Information as part of the onboarding process.

Payment Details: We will ask you to provide Us with your credit/debit card and bank account details to process your payment for the Services.

Clinical Data: We might collect your temperature, blood pressure, heart rate, respiratory rate through associated Devices that you purchased from Us which wirelessly connect to your MiiCube. Clinical Data is treated as being a special category of personal data under applicable data protection laws.

Sensors Information: MiiCube through its eco-system of sensors, devices and wearables that we have provided to you, will collect data about whereabouts at home (location). ambient temperature and humidity in the different locations, use of doors at home, use of appliances, steps, calories, sleep time, hydration, medication taken, visitors visiting.

Voice and Audio Data: Speech responses recorded by our core user-facing product, the MiiCube for interaction purposes with the in-built virtual assistant. Among the Non-Personal Information we collect, acoustic recording sensors capture audio only relevant to user health.

Housing Details: We will collect information about the number of bedrooms in your house, the size of the rooms, details about appliances being used, existence of front/back doors, and the type of the house the User resides in.

Application: The information we collect through MiiCube Application is Personal Information about the VIP and/or Subscriber that you have entered into the MiiCube system and provided Us as part of the setup of User/Subscriber profile in the Application. This may be Full Name, Home Address, Gender, DoB/Age, Profile Image, Email Address, Phone Number, Emergency Contacts (up to 3), Known Conditions, Relationship of subscriber to user, Carer/support staff details.

Information We collect on you from other sources

We may collect Personal Information about you from other sources such as social networks, credit agencies or other third-party source which is relevant to the provision of Our Services.

What if you fail to provide Personal Information?

Where We need to collect Personal Information by law, or under the terms of a contract We have with you, and you fail to provide that Personal Information when requested, We may not be able to perform the contract (for example, to provide you with the Services). In this case, We may have to cancel a Service you have with Us but We will notify you if this is the case at the time.

How do We use the Personal Information?

We will only use your Personal Information when the law allows Us to and have your consent and we use the information with a good sense of purpose to provide you with the information and reassurance provided by the Service. Most commonly, We will use your Personal Information in the following circumstances:

- Where We need to perform the contract We are about to enter into or have entered into with you.

- Where it is necessary for Our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where We need to comply with a legal obligation.
- Where We receive your consent to process your Personal Information, such as to process your health data or to send you marketing communications. You have the right to withdraw your consent at any time by contacting Us at contact@miicare.co.uk but please note that withdrawal of your consent will not affect the lawfulness of any processing of Personal Information based on your consent before its withdrawal.

Purposes for which We will use your Personal Information

We use the Personal Information for the following purposes:

1. To configure the Services which We provide to the VIP and Subscriber
2. We use the data collected by the MiiCube from the Devices combined with rules set by the Subscriber along with learned behaviour to inform the Subscriber of alert messages
3. To communicate with the VIP and approved Subscribers and keep you informed of any changes which may have an impact on the Services which We provide to you
4. To customise Our Services to the needs of the VIP and Subscriber
5. To enable Us to develop and improve Our Services through data collected through analytics
6. To communicate with the VIP and Subscriber and respond to your queries
7. To provide the VIP and Subscriber with promotional communication relating to the Services if We have your consent to send you marketing communications
8. To comply with applicable laws and regulation

Who do We share your Personal Information with?

We do not rent, sell, or share your Personal Information with third parties except as described in this Privacy Policy. We may share your Personal Information with the below parties:

1. Business partners with whom We have entered into agreements for processing your Personal Information related to the provision of the Services
2. To Stripe, our payment processing provider, to provide you with secure payment processing services
3. In the event We sell or buy any assets or businesses, your Personal Information may be shared with the prospective seller or buyer
4. To regulatory bodies if We are under a duty to disclose your Personal Information to them
5. Between the VIP and their approved Subscribers as required to provide the Service.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow Our third-party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with Our instructions.

International Transfers of Personal Information

We do not transfer your Personal Information outside the European Economic Area or the United Kingdom. Your Personal Information is stored in Data Centres located in Cardiff (UK West Centre) and/or London (UK South Centre)

Data Security

1. Personal Information will be collected via our Application, which will transfer the data via secure HTTPS connections to the applicable Data Centres.
2. Non-Personal Information will be collected by our proprietary sensors which operate on a secure private local wireless network and transferred to the nearest Cloud Data Centre.
3. Speech responses recorded by our core user-facing product, the MiiCube for interaction purposes with the in-built virtual assistant are:
 - a. Transformed into frequency-time-intensity image-like representations called spectrograms which are very difficult to be converted back into audio without incurring heavy information loss (Security by Data Representation Design)
 - b. Fed to edge-facing conversation AI, which do not store any of the data
 - c. Subject to storage in the form of spectrograms only to improve the aforementioned conversation AI
4. Among the Non-Personal Information we collect, acoustic recording sensors capture audio only relevant to user health:
 - a. We use spectrograms as an effectively non-reversible representation of audio data
 - b. We use AI to only detect non-speech acoustic events, specifically events relating to:
 - i. Security Surveillance: door noises, glass breaks, gunshots, etc. or any event unusual in a domestic environment
 - ii. Footstep Data: for analysis of user's gait and walking patterns
 - iii. Emergencies: falls, cries/screams for help, etc.

Communication protocols that transfers the data from MiiCube towards the cloud system and from there to/from the Application, is fully encrypted and secured aligned with industry standards. Data that is collected by MiiCube (Personal Information and Non-Personal Information), is stored in the cloud, in our data centre securely. Access to this data is available to authorised users only, through an authentication and authorisation mechanism. Each User / subscriber / role defined in the system, will have access only to information and data that he is authorised to access.

How to contact Us?

You can reach MiiCare via contact@miicare.co.uk.

How long do We keep your Personal Information?

We will only keep your Personal Information for as long as reasonably necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. Personal Information is stored as long as the user is an active customer of the Services We provide and will be deleted within 90 days of the termination of the service. Some personal information will be anonymised and preserved as it is used for machine learning purposes and will be incorporated into existing statistical calculations and system wide processes. An archive of information stored and will be retained by us in accordance with our retention policy (10 years).

Your Rights with respect of the Personal Information

You have the right to:

1. Request for access to your Personal Information held by Us.
2. Request correction of your Personal Information.
3. Request erasure of your Personal Information.
4. Object to the processing of your Personal Information.
5. Request restriction of processing of your Personal Information.
6. Request transfer of your Personal Information to you or a third party.
7. Withdraw your consent to the processing of your Personal Information where We rely on consent to process your Personal Information (for example, for sending marketing communications, storing certain cookies or processing health data). If you withdraw your consent, We may not be able to provide certain Services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact Us at contact@miicare.co.uk.

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, We could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help Us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights in relation to the Personal Information). This is a security measure to ensure that your Personal Information is not disclosed to any person who has no right to receive it.

We try to respond to all legitimate requests within one month. Occasionally it could take Us longer than a month if your request is particularly complex or you have made a number of requests. In this case, We will notify you and keep you updated.

Cookie Policy

Cookies are small text files (composed only of letters and numbers) that a web server places on your computer or mobile device when you visit a webpage. Cookies can help make our Services more user-friendly.

We do not use cookies to:

1. Collect any Personal Information (without your express permission)
2. Collect any sensitive information (without your express permission)
3. Pass Personal Information to third parties

Granting Us permission to use cookies

If the settings on your software that you are using to view this website (your browser) are configured to accept cookies, and you continue to use our website, then We take this as being you are consenting to our data policy.

Should you wish not use cookies from our site you can configure your browser accordingly or you can contact Us a contact@miicare.co.uk, however doing so may limit how We customise the information We want to share with you and Our site may not work as you would expect.

Links to third party sites appear on the site

We may use links to third party sites to share the information We feel is appropriate to you. While We exercise a lot of care in choosing the third parties, We cannot be held liable for their actions. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. You should therefore read and satisfy yourself with the privacy policy of those third parties.

Complaints

You have a right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk/make-a-complaint/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact Us in the first instance at complains@miicare.co.uk