

This privacy policy applies to the website, services, hardware, and software products offered by Minder Limited (a company incorporated in England and Wales with registered number 06170552 and whose registered office is at 19 Great Linns, Marston Moretaine, Bedford MK43 0DD, United Kingdom), which trades as Mindme.

Minder Limited is the data controller in respect of the processing activities set out in this Privacy Policy. Our contact details are at the end of this privacy policy.

What we do

We are Minder Limited, trading as Mindme.

We operate various websites, including mindme.care and its subdomains, and a Platform.

The **Platform** – currently at user.mindme.care – is where users and their Registered Contacts go to see the status and alerts from a Device.

The **Device** is the physical equipment, which is used to send location messages and/or make and receive voice calls. The Device is used by a User, who may or not also be a Purchaser. A Purchaser is someone who purchases a Device or a service plan from us.

A **Registered Contact** is someone whose details have been put into the Platform, usually by a User or a Purchaser, on the basis that they might be able to help in an emergency.

Our Devices are configured to enable a User to contact (subject to the limitations set out in the terms) the **Response Centre**. This is the organisation that answers calls for emergency assistance.

The data we process and why

We process personal data in different ways, depending on your relationship with us. You are not required to provide any personal data to us but, if you do not, you may not be able to purchase or use our services, and the service we can offer to the User may be impacted.

If you contact us:

- name;
- email address;
- telephone number;
- your address;
- your comments/enquiry

We will use these data for our legitimate interest of responding to your query. We keep records of communications for six years (from date of the communication if you are not a customer, and from the date of termination of your agreement with us if you are a customer).

If you carry or wear a Device:

- location data;
- sensor data (if and when sensors are enabled);
- device data (such a battery level, whether charging and when turned off);

We will use these data to provide our monitoring service. If we have a contract with you to provide the service, we use these data to perform our contract. If we do not have a contract with you (perhaps someone else bought the Device and pays for your service plan), we process these data for the legitimate interest of providing the service. See below for our retention periods.

If you call the Response Centre, the Response Centre will use the information available to it to help respond to you call. The Response Centre records calls made to it and it keeps those calls for 12 months. The Response Centre processes data for the legitimate interests of enabling it to provide emergency assistance, deal with queries, train its staff, and prevent and detect misuse of the service.

If you use the Platform:

- name, date of birth, telephone numbers and address of the person carrying or wearing the Device;
- a description of the person carrying or wearing the Device;
- name, address, telephone numbers and relationships or friends, family, next of kin of the person carrying or wearing the Device;
- name, address and telephone number of the GP of the person carrying or wearing the Device;
- confidential notes about the person carrying or wearing the Device;
- an emergency procedure to follow for the person carrying or wearing the Device;
- medical conditions of the person carrying or wearing the Device;
- the vehicle details of the person carrying or wearing the Device;
- telephone numbers and email addresses of who to contact in the event of low battery alerts and perimeter breaches if they are configured;
- a location representing a 'home location' of the Device;
- if applicable for the Device, Wi-Fi network names and passwords which the Device can use to connect to the networks;

We will use these data to provide our monitoring service. If we have a contract with you to provide the service, we use these data to perform our contract. If we do not have a contract with you (perhaps someone else bought the Device and pays for your service plan), we process these data for the legitimate interest of providing the service.

We retain Device-related and Platform-related data as follows:

- position and location data is retained for three months;
- alarms logs are kept for one year;
- notifications logs (details about who low battery and perimeter alerts have been sent to and when) are kept for three months;
- activity logs are kept for one year;
- database backups are retained for one year;
- personal information, the email addresses, and SMS numbers used for alerts are stored whilst the related unit is active on the system. The data can be edited (including cleared) at any time but please be aware that this may impact on the service you can then receive.
- at any time you can ask us to delete all of the data relating to your device, your personal details, and alert notifications.

If you are a Registered Contact:

- telephone number and other contact details
- your name, if you are set us as contact for the Response Centre.

We process these data for the legitimate interest of providing the service. We keep these data for as long as we provide service to the User for whom you are a Registered Contact.

(We get these details from our Users, or whoever sets up their account – we do not independently verify that they are correct. If you are listed as a Registered Contact and think we might have incorrect information for, you do contact us, or ask the relevant User to change it.)

If you purchase a Device via the Website:

- your contact details
- record of your purchase

We process these data to perform our contract with you. We keep these data for seven years for accounting purposes.

We do not store any payment card details. We use Worldpay¹ and Stripe² to process payments, and you can find their privacy notices on their websites;

If you are an individual contact in connection with a business contract:

- your contact details
- the organisation with which you are affiliated, and your role
- records of our communications with you (e.g. notes of meetings or discussions)

We process these data for the legitimate interest of entering into, performing, and managing our contract with the organisation with which you are affiliated. We keep these data for the duration of our contract with you, and then for one year after that (in case of post-contractual queries).

¹<https://www.fisglobal.com/en/privacy>

²<https://stripe.com/privacy>

Who we share Data with

- our professional advisors - to obtain advice from professional advisers and provide products and services for our customers;
- the Response Centre who provides a service to us which requires the processing of personal data;
- third party payment providers who process payments made over the Website - to enable third party payment providers to process user payments and refunds. We use Worldpay³ and Stripe⁴ whose Privacy Policies are on their websites;
- a third party provider to send email alerts related to the Device. We use Mailgun⁵ and their GDPR statement is available on their website;
- a third party provider to send SMS alerts related to the Device. We use Text Anywhere⁶ and their Privacy Policy is available on their website;
- relevant authorities - to facilitate the detection of crime or the collection of taxes or duties;
- other contacts that you choose to add to your account. This could be a Device carrier or wearer or a named contact associated with that Device carrier or wearer, or an email address or telephone number associated with someone managing a Device;
- if we sold the Mindme business, the actual or potential purchaser(s) of the business.

³<https://www.fisglobal.com/en/privacy>

⁴<https://stripe.com/privacy>

⁵<https://www.mailgun.com/gdpr/>

⁶<https://www.textanywhere.com/policy-documents/privacy-policy/>

Your rights

You have the following rights in relation to your Data:

- Right to access - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information.
- Right to correct - the right to have your Data rectified if it is inaccurate or incomplete.
- Right to erase - the right to request that we delete or remove your Data from our systems.
- Right to restrict our use of your Data - the right to "block" us from using your Data or limit the way in which we can use it.
- Right to data portability (in some circumstances) - the right to request that we move, copy or transfer your Data.
- Right to object - the right to object to our use of your Data including where we use it for our legitimate interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: support@mindme.care.

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website⁷.

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Changes to this privacy policy

If we make minor changes to this privacy policy, we will update it.

If we make more significant changes, which we believe will impact you, we will do our best to contact you and notify you of them.

You may contact Mindme by email at support@mindme.care.

Last updated on 1 October 2023.

⁷<https://ico.org.uk/>