



Last Updated: 12.08.2025

Website Privacy Notice

Hiwell LTD (“**Hiwell**”), a company having its registered office at 5 Beaufort Court, Admirals Way, London, United Kingdom, E14 9XL, [“**Hiwell**” or/and “**Company**”] process your personal data, that is to say information about you that can enable to directly or indirectly identify you, as the data controller, within the scope of the platform services (‘**Services**’) offered through our website and application, unless otherwise stated below.

This Privacy Notice applies whenever your personal data is processed as part of the Services. It describes how we process your personal data when providing these Services to you, and your rights concerning your personal data.

1. Which of Your Personal Data is Processed and What are the Purposes of Processing Your Personal Data?

Hiwell does not process your personal data other than that listed below within the scope of the Services. However, we would like to remind you that your personal data may be processed by your therapist, as data controller, within the framework of psychological consulting and nutrition and dietetics services.

A. Information About You That You Share with Us Directly

When you use the Services, you may provide us with your personal data directly (for example, when uploading Hiwell’s application), and Hiwell will store your personal data on its systems and process it for the purposes described in this Privacy Notice.

Depending on the Services, the personal data will be relevant to providing those Services and include the following:

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
Identification data Customer transaction information Communication data Information on the Services that you purchase Information about your payments for services Transaction security information	Necessary for the performance of the contract	Providing the Services and creating customers’ accounts Executing the Service sales and contract processes Providing information security Executing the communication processes Enforcing the applicable Terms of Service



	Hiwell's legal obligations	Cooperating with public authorities and law enforcement where lawfully permitted or required Executing access authorizations Following and executing legal affairs Executing finance and accounting affairs
	Hiwell's legitimate interest in fighting against fraud and potentially illegal activities	For security purposes and preventing fraud or potentially illegal activities Ensuring the security of data controller operations

Hiwell processes your personal data in order to connect you with the therapist who has suitable expertise based on the results of the onboarding test you filled in when you started using Hiwell's application, depending on your consent. This information will be shared with the therapist you are referred to.

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
Identification data Communication data	Necessary for the performance of the contract	Providing the Services and creating customers' accounts Executing the Service sales and contract processes
	Hiwell's legitimate interest in improving the Services	Optimizing the Services and the customers' experiences Executing the activities for customers' satisfaction
Information provided by patients for the onboarding test.	Necessary for the performance of the contract with your explicit consent for the processing of sensitive data, if required under applicable law	Connecting the customers with suitable therapists depending on the psychological and nutritional needs of the customers

On Hiwell's website, you can take psychological awareness tests that provide general results based on the answers you give, even when you are not a Hiwell customer. In this case, personal data will include the following:

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
Information on the psychological awareness test	Consent	Managing potential customers' communications



		Conducting marketing and analytics processes
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You can submit your requests and complaints to Hiwell via the chat screen of the website. The personal data may vary depending on the details you submit and will include the following:

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
Identification data Information related to your request and complaint Communication data	Hiwell's legitimate interest in improving the Services and answering your request	Executing the customer relationship management processes Responding to requests and/or complaints Improving and optimizing the Services and the customers' experiences Executing the communication processes

B. Information You Generate Using Hiwell's Services

When you use the Services, Hiwell will collect personal data about the ways in which you use and interact with the Services.

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
Information on when and how long you subscribe to our Services Information on your preferences for our Services Transaction security information Customer transaction information	Hiwell's legitimate interest in improving the Services	Execution of activities for customers' satisfaction Execution of activities to ensure business continuity Conducting business activities Improving, optimizing our Services and our customers' experiences
	Consent	Marketing, analytics, and delivering behavioral advertising

If you prefer to receive notifications and/or emails about campaigns, promotions, or sales of Hiwell's Services, depending on your consent, Hiwell shares new developments about the Services, and processes your personal data as follows:



Personal Data	Legal Basis	Purposes of Processing Your Personal Data
Identification data Communication data Information on the performance data about the usage of the Services	Consent	Marketing, analytics, and delivering behavioral advertising Conducting marketing analyses Managing customers' communications

C. Information We Get About You from Connected Third-Party Platforms

If you connect Hiwell's application via social networks like Facebook, Google, or other connected third-party platforms, Hiwell may receive your personal data from that third-party platform.

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
Identification data Transaction security information Communication data	Necessary for the performance of the contract	Conducting business activities Protecting the safety of customers
	Hiwell's legal obligations	Cooperating with public authorities and law enforcement where lawfully permitted or required
	Hiwell's legitimate interest in fighting against fraud and potentially illegal activities	For security purposes and to prevent fraud or potentially illegal activities Protecting Hiwell's rights, including compliance with applicable legal obligations, resolving any disputes we may have, and administering our agreements with third parties

If you access Hiwell's Services from a third-party platform or connect Hiwell's Services to a third-party account, you should also read that platform's terms of service and privacy notice.

If you are unclear about what information a third-party platform is sharing with us, please go to that platform to find out more about their privacy practices and any options available to you regarding such sharing.



D. Cookies and Other Automated Information Collection

Hiwell uses cookies and other similar technologies (e.g. device identifiers) to recognize you and/or your device(s) across different services (both Hiwell’s Services and third-party services), including for advertising purposes. Hiwell explains why we do this, and how to control cookies and similar technologies, in the applicable [Cookie Notice](#).

Hiwell uses these cookies and other similar technologies to process personal data, including:

Personal Data	Legal Basis	Purposes of Processing Your Personal Data
Transaction security data Identification data Information on your movements and preferences on the website	Necessary for the performance of the contract	Conducting business activities Ensuring the security of data controller operations Operation of the website
Information on the amount of time spent on an app feature or website Information on the pages viewed and the order of those pages	Hiwell’s legitimate interest, in particular relating to security, fraud detection, and management	For security purposes and to prevent fraud or potentially illegal activities
	Consent	Marketing, research, analytics and delivering behavioral advertising Personalizing the Services and our customers’ experiences
	Hiwell’s legitimate interest in improving its Services and its website	Improving, and optimizing the Services and the customers’ experiences

2. How We Transfer Your Personal Data

When Hiwell transfers your personal data internationally we treat your personal data securely, lawfully, and in accordance with privacy obligations. Please note that the privacy laws vary from jurisdiction to jurisdiction when transferring personal data internationally, so the privacy laws applicable to the places where your information is processed may be different from the privacy laws applicable to the place where you are resident.

If the Services are used from the EU/EEA, any transfer of your personal data outside of the EU/EEA will be carried out only if the recipient country has an adequate level of personal data protection (as decided by the European Commission), or if the transfer is subject to the European Commission Standard Contractual Clauses (SCC) in force at the time for the transfer of personal data to third countries.

A. Authorized Persons, Institutions, Organizations, competent authorities and law enforcement agencies



Depending on compliance with a legal obligation, or legal demands of authorized persons, institutions, organizations, competent authorities and law enforcement agencies, Hiwell may share your personal data with these entities.

Personal Data	Legal Basis	Purposes of Transferring Your Personal Data
Identification data Customer transaction information Communication data Information on the Services that you purchase Information on any purchases you make for the Services Transaction security information	Hiwell’s legal obligations, in particular relating to provide information to authorized persons, institutions, organizations, competent authorities and law enforcement agencies	Providing information to authorized persons, institutions and organizations

B. Third-Party Service Providers

Hiwell will share your personal data with third parties who perform services to Hiwell, for hosting services, and security of the Services, executing business activities including financial affairs, and our third-party business partners who assist us in delivering and optimizing the Services.

C. Targeted Behavioral Advertising

Hiwell will share your personal data with Meta Inc. to help make the advertisements you see more relevant to your interests when you use the Services, depending on your consent.

Personal Data	Legal Basis	Purposes of Transferring Your Personal Data
Performance data on application usage Communication data	Consent	Offering targeted advertising in the third-party service for the Services that are more likely to appeal to customers Undertaking analytics to analyze customers’ activity

Please note that the practices of third-party companies delivering advertisements on our Services are subject to those companies’ own privacy policies and privacy practices. If you have any questions about how these third-party services use your personal data, you should review their policies and contact them directly.

3. Your Rights

Your rights on personal data protection are explained below. These rights apply to information about you, and their scope and applicability can vary across different regions. Hiwell will comply with applicable privacy laws, including any required response times.



Subject to certain exemptions, you have the right to:

- Request information on whether your personal data is processed or not and request access to this information,
- Receive information on the purposes of processing your personal data and whether your personal data is used in compliance with these purposes of processing,
- Receive information on the third parties to whom your personal data are transferred in country or abroad,
- Request the rectification of the incomplete or inaccurate data, if any,
- Demand the erasure or destruction of your personal data under the conditions stipulated in the applicable personal data regulations (except where Hiwell justifies the storage of personal data, e.g. in order to fulfil legal obligations),
- Demand the restriction of processing of your personal data (except limitations provided in applicable regulations),
- Object to the processing of your personal data (except limitations provided in applicable regulations),
- Request portability of your personal data (except limitations provided in applicable regulations),
- Object to the occurrence of a result against you by analyzing the data processed solely through automated systems,
- Claim compensation for the damage arising from the unlawful processing of your personal data if such right is provided under applicable regulations and laws,
- Withdraw your consent at any time for data processing that relies on your consent,
- Lodge a complaint with your local data protection authority.
- Provide Hiwell with instructions regarding the use of your personal data after your death.

You can exercise these rights by contacting us as explained under the section “Contact Us” below.

4. Security of Your Personal Data

We implement reasonable and appropriate security measures in order to preserve the security, integrity, and confidentiality of your personal data, and, in particular, to protect such data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to it in accordance with this Privacy Notice.

Where you access the Services through another account (for example, a social network) please keep that account information secure as well.

5. Our Policies Concerning Children

Hiwell’s Services are not marketed to, or intended for, children. For these purposes, Hiwell uses the term “children” to refer to someone who is under 18 years old.



6. How Long We Keep Your Personal Data

Hiwell undertakes not to keep your personal data beyond the period strictly necessary for the purposes for which it was collected, and in accordance with the applicable regulations, as well as any laws and regulations, including taxing and accounting obligations.

Hiwell undertakes to anonymize, delete or archive your personal data as soon as the purpose and/or the duration of their established retention expire.

7. Contact Us

If you have any questions regarding the processing of your personal data, or if you would like to exercise one or several of the rights mentioned above, you can deliver your requests about the processing of your personal data via the [Data Subject Request Form](#), and send it to:

dpo@hiwellapp.com

You should express in a clear and understandable way what is requested in the application, which you will make to practice the rights mentioned above. Information and documents related to the application should be attached to the application. Although the subject of the request must be related to the person of the applicant, if acting on behalf of data subject, the applicant must be specifically authorized in this regard and this authority must be documented (special power of attorney). Requests made by unauthorized third parties on behalf of data subject shall not be valid.

You can also contact our Data Protection Officer at privacy@hiwellapp.com

Our representative within the EU is Maria Theodoratou, maria@hiwellapp.com

8. Changes to Our Privacy Notice

Hiwell may update this Privacy Notice from time to time. When Hiwell does, it will revise the “last updated” date at the top of the Privacy Notice. If we make changes that we deem material, Hiwell will use reasonable efforts to notify you (such as by placing a notice in our application or on our website, or by sending you a notice to the email address you have registered with Hiwell, if any). We encourage you to periodically check this Privacy Notice for updates on Hiwell’s website. If you would like a copy of earlier policies, please get in touch using the Contact Us information above.