

Privacy Policy

We're committed to safeguarding your privacy.

1. Introduction

At Dermconcept we care about your privacy. We are fully committed to protecting and safeguarding the personal data you share with us when you use our service. In this Privacy Policy, we explain what kind of data we use, and how we use it. If you have any questions, do not hesitate to contact us via the contact details listed at the end of this Policy. For further information about our use of cookies, we refer to our Cookie Policy. We might amend this Privacy Policy from time to time. Visit this page regularly in order to understand what we do. If we make changes which are relevant to your consent and underlying information, we will always notify you before you use our service. If you do not agree with our processing of personal data as described in this Privacy Policy, you cannot continue the use of our Services. If you agree with our Privacy Policy, we hereby welcome you to our service and you're ready to start making assessments. This is because we do require the minimum quantity of data we request in order to provide you with an effective personalized skin assessment and personalized skincare. Below you can find summaries of the information in this Privacy Policy.

1.1. The personal data DermConcept collects. To be able to assess and monitor your skin for subsequent skincare recommendations, certain information is necessary for us to be able to provide you with our Services. You can sign up for our service in the App using your email address. We collect information about the device you use to access our App or Websites. The type of information we collect can, for example, include the type of your device, the software you use, location, device language and your IP address. In addition to this, we collect the data you provide in the App including the answers to the questionnaire regarding your skin profile and the pictures you take.

1.2. Why DermConcept collects your data. We use your data to assist you in the best possible way by analysing your skin in order to provide you with personalized skincare . We need certain data in order to provide you with our full service and assist you with your skincare experience. We may also use your data for research purposes to improve our service. Furthermore, your information may be used for customer service, marketing, communications, and for legal purposes.

1.3 DermConcept and third parties. DermConcept has third party service providers that help us provide or improve our service, this includes service providers, payment providers and financial institutions, business partners or research institutions.

1.4 Privacy, data security, and data retention. DermConcept has implemented various measures and procedures to safeguard your

personal data, as stipulated by European and UK data protection law.

1.5. Personal data of children. Our service can only be used when you have reached the age of eighteen (18) years and above

1.6 Your rights – access to your information At any time you can make a request to review, correct, delete and obtain your data. You are also entitled to withdraw consent for the processing of the personal data we hold of you. You can do this by mail or email, using the addresses listed below. You can also request that DermConcept deletes your personal and skin data. In that case, you can send your request via info@dermconcept.com.

1.7 Responsible party for the processing DermConcept Ltd., located in London, UK, is the owner and operator of the service and is the controller of personal data processed via the Website and the App. Please find the full explanation on how we process your data below.

2. The personal data DermConcept collects

2.1 Personal data you provide to us: The data you provide to us is collected and used (“processed”) by us to provide you with our best service. The minimum information you are asked to provide us is your first and last name, date of birth and email address in order to access our service. In our App, you can provide further information regarding your skin type, skin problems and concerns you may have via a questionnaire and the skincare products you currently use . We also process the pictures you take of your skin and skin measurements of skin hydration and skin sebum. Without your explicit consent, we

are not allowed to store this type of information, and we cannot provide you with our service. Other information we collect is the information you provide to complete your personal profile: your first name and last name, gender, date of birth, location, language. When you use our services and submit your picture and skin measurements, we store the photos and collect the information of your assessment. We do this to be able to assist you with your personalized skin experience. To provide the DermConcept Service, we need to be able to securely handle your skin data. This means that we process your photo with our algorithms to be able to compose the best possible personalized skincare products for your skin type. We will store the photo and skin measurements on our servers so we can compare them over time and monitor any changes so that we can tweak and change your personalized skincare accordingly. Furthermore, our in-house team of experts need permission to check the photos and skin data for quality control. We will ask for your explicit consent to allow us to store this type of information before you use such service, without your consent we cannot provide you with our service. By accepting this Privacy Policy, you consent to the processing of your skin data. As part of your personalized skin experience, we may send you follow-up emails to assist you when necessary, through our Customer Support. If you reply to these emails and get in touch with our Customer Support we will collect the information that you provide in these replies from you too. When you use our App, we also collect data that identifies your mobile device and your use of the platform.

The information we store includes notification access, device-specific settings and characteristics, system activity, location details, IP address, language settings, app crashes and other device event information, access data and times of your usage of the app. We collect information when you give us feedback via your Apple App Store, Google Play Store or the questionnaire.

2.2 Personal information you provide us regarding the health of others Our service is exclusively meant for your personal use. If you want to share our personalized skincare with others, please do so by encouraging them to download their own version of DermConcept.

2.3 Automatically collected personal data. During your visit to our Website or App, we automatically collect certain information about you, your visit of the service and the device you are using. This data includes data on the hardware, software, operating system, internet browser, IP address, language and application settings and version. We also collect data about when and how you used the service, including interaction with the elements on it and which pages you visited in the App or on the Website.

3. Why DermConcept collects your data We use your data to assist you in the best possible way, your data may be used for the following reasons: Personalized skincare experience: The main reason why we collect your personal data is to supply you with our core service: provision of a personalized skincare experience based on questionnaire, skin measurements (hydration and sebum) and skin photos leading to the provision of personalized skincare for you. We

use the data you provide us to manage our Website, App, and business and to improve our services continuously.

Customer Service: Our customer service is here to help you and we use your data to do so. This includes email replies to your emails when and if you need further assistance with your skincare regime as you use it. **Marketing:** To keep you informed, we may send you communications relating to our business, by email or other contact details you provided us. Please note that your skin data and photos are never being processed for marketing purposes.

Communications: We will send you communication regarding your personalized skincare regime if necessary as follow-up if you ask for further assistance from us. If you opt-in for our mailing list, we may send you non-commercial communications, including our newsletter. When you use our services, we may send you a questionnaire or invite you to provide a review of your experiences with our service. We also may get in touch with you regarding feedback, inquiries, and complaints you made regarding our Website and App.

Research activities: In order to improve our quality and develop further our service, we may use your data, pseudonymized (without a direct link to your identity) or anonymized (without us being able to identify you at all), for in-house research purposes. By uploading your images and skin data in the App, you explicitly consent to the images being processed for the purposes of the provision of the services and

to be used anonymously for the purposes of in-house research and testing of our services. As such, your images may be reviewed by our employees or third-party consultants who work for us and who are bound by strict confidentiality.

Legal purposes: In certain cases, we may need to use your information to handle and resolve legal disputes, for regulatory investigations and compliance, or to enforce the terms of use of the service as reasonably expected. We collect and process your data based on the following legal grounds: Contractual necessity: In order to fulfill the contract you enter into with us when you use our Services, we have to process some essential information. When you wish to use one of our paid services we may need to process your email address, pictures of skin and payment information. Legitimate interests: We are committed to improving and growing our service. Some of your data can help us to improve and promote our Service and Website, other data we may need for administrative, legal purposes or anti-fraud activities. Legal obligations: We have to comply with certain laws and (country specific) regulations. In order to comply with these, we need information about your location and date of birth. Consent: For certain promotional and marketing activities, we may ask additional consent. When you wish to withdraw your consent, please contact us on info@dermconcept.com

4. Dermconcept and third parties

For some specific reasons, Dermconcept may share your personal data with carefully selected third parties. These parties are Processors for your personal and skin data. Please find an up-to-date list of our third parties here:

- Chowis Ltd

For details on Chowis ltd privacy policy and how they use your data please refer to <https://chowis.com/privacy-policy/>

5. Dermconcept and social media

DermConcept uses social media for various reasons. On our Website, we integrate social media like and share buttons (Facebook, Instagram, Twitter, LinkedIn), which allows you to share the content you like directly with your network. The social media plugins may process your personal data when you choose to share or like any content of our Website with your network. DermConcept does not control and is not responsible for the processing of personal data by these networks.

7. Data privacy, security, and data retention

7.1 Privacy All data you provide us and we collect from you is stored on secure cloud servers (the Servers) in the territory of the European Union, or stored by trusted third party service providers outside of the EU, which are held to similarly high standards. As a result, your personal information may be transferred to and stored at a destination

outside your country. By submitting your personal information, you agree to the transfer of your personal information to the servers.

Personal information may also be processed by staff or by other third-party service providers operating outside your country who work for us. We take such steps as are necessary for the circumstances to

ensure that any third-party service providers treat your data securely and in accordance with applicable laws. 7.2 Data security All data that

you provide through the App and/or the Website is encrypted when it is transferred to or from the servers using industry-standard

encryption (TLS). Furthermore, data is stored in encrypted form when at rest on the servers. We store your account information and your

digital images in separate data stores. The cloud server infrastructure is protected using firewalls and monitoring. Dermconcept - Privacy

Policy Version 2.14 We work with appropriate procedures to prevent unauthorised access to and/or misuse of your personal data.

Dermconcept uses appropriate procedures and business systems to safeguard your personal data. Furthermore, we use security

procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorized personnel can

access your personal data. 7.3 Data retention Dermconcept will

destroy or de-identify your personal information once it is no longer required for the purpose or purposes for which it was collected. If you

terminate the Services and delete your account, we will retain your personal information for a period of 12 months, after which we will

delete your data. We will retain the images you have uploaded prior to

termination in anonymous form only, for the purposes of scientific and commercial research, and for testing of the Services. We will ask for your consent to process your data anonymously for research purposes. We will retain (electronic) documents containing personal information: ● to the extent that we are required to do so by law; ● if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and ● in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

8. Personal data of children Our service can only be used when you have reached the age of eighteen (18) years or older. When we identify personal information of Dermconcept - Privacy Policy Version 2.14 children younger than eighteen (18) years old, we shall delete the data based on our legal obligations.

9. Your rights – access to your information We will, upon your request, provide you with access to your personal information that is held by us. We request that you provide us with appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport plus an original copy of a utility bill showing your current address). We will require you to make your personal identification number and picture invisible to us. In your request for access, we also request that you identify, as clearly as possible, the type(s) of information you wish to have access to. We will comply with your request to provide access to your personal information within 30 days and if you agree, we may charge you our reasonable

costs incurred in supplying you with access to this information. At any time, you can make a request to review, correct, delete, or obtain your data. You can also withdraw consent for the processing of the personal data we hold of you. You can make such request by mail or email, using the addresses listed below. You also have the right to contact the Data Protection Authority when you have concerns about your rights, or if you feel that we are unlawfully processing your data. You may oppose the processing of personal information concerning you, even if they are relevant to the purpose of the collection. You may instruct us at any time not to process your personal information for marketing purposes and we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

10. Responsible party for the processing of your data. The Website and the Application are owned and operated by Dermconcept Ltd., our principal place of business is at 10 Harley Street, London W1G 9PF, UK. You can contact us by writing to the business address given above, by using our Website contact form or the feedback form in the App, or by sending an email to the Data Privacy Officer at info@dermconcept.com