

## Potentiallife Privacy Notice

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## Overview

The intention of this document is to ensure that individuals are able to understand how Potentiallife collects, processes and stores personal data and to ensure that individuals have control over such use of their data, including the right to be forgotten.

The use of the Internet pages of the Potentiallife Limited is possible without any processing of personal data; however, if any individual (known as a “data subject”) wants to use services via our websites or mobile applications, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we will obtain consent from the data subject so that we can confirm that consent has been given to the relevant data controller.

The processing of personal data, such as the name, address, email address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Potentiallife Limited. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

Potentiallife Limited may also be contracted to provide services directly to end users, for example through a business-to-business relationship, in order to provide a more seamless experience. In such cases the data subject should contact their respective employer should they have any enquiries regarding their rights or exercising thereof.

Potentiallife Limited has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through the Potentiallife web and mobile app based services.

## Definitions

The data protection declaration of Potentiallife Limited is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we have provided a list of relevant definitions which can be found in [Appendix A: Definitions](#).

## Rights of data subject

Potentiallife Limited is committed to uphold the rights granted to the individual data subject by the European legislator. See [Appendix B: Rights of Data Subject](#) for more information about your rights.

## Data collection

### Collection of general data and information

The websites and services of Potentiallife Limited collect a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. The data collected may include:

- 1) the browser types and versions used
- 2) the operating system used by the accessing system
- 3) the website from which an accessing system reaches our website (so-called referrers)
- 4) the sub-websites
- 5) the date and time of access to the Internet site
- 6) an Internet protocol address (IP address)
- 7) the Internet service provider of the accessing system
- 8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Potentiallife Limited does not draw any conclusions about the data subject. Rather, this information is needed to:

- 1) deliver the content of our website correctly
- 2) optimize the content of our website
- 3) ensure the long-term viability of our information technology systems and website technology
- 4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

Therefore, Potentiallife Limited analyzes anonymously collected data and information at an aggregate level, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

### Cookies and other technologies

Potentiallife Limited utilizes technologies such as cookies and pixel tracking to provide, improve, protect and promote our services and the experience for our users. To read more about how these technologies function see [Appendix C: Technical Explanations](#).

### Subscription to our newsletters

On the website of Potentiallife Limited, users are presented with the opportunity to subscribe to our newsletter using an email address of their choice.

Potentiallife Limited informs its customers and business partners regularly by means of a newsletter. The newsletter may only be received by the data subject if:

- 1) the data subject has a valid email address
- 2) the data subject registers for the newsletter and therefore accepts our terms and conditions.

During the registration for the newsletter, we also store the time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the email address of a data subject at a later date, and it therefore serves the aim of the legal protection of Potentiallife Limited.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by email, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding unsubscribe link is found in each newsletter.

## Employment applications and procedures

Potentiallife Limited shall collect and process the personal data of applicants for the purpose of the processing of the application procedure. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by email or by means of a web form on the website. If Potentiallife Limited concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant, the application documents shall be automatically erased six months after notification of the refusal decision, provided that no other legitimate interests of Potentiallife Limited are opposed to the erasure.

## Data collection through communications

The website of Potentiallife Limited contains information that enables quick electronic contact to our enterprise, as well as direct communication with us through email. If a data subject contacts Potentiallife Limited by email or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to Potentiallife Limited are stored for the purpose of processing or contacting the data subject. To assist registered users in using our websites and services Potentiallife Limited utilises Zendesk as a third party provider which is embedded on selected websites. Data entered into the Zendesk integration will be stored and processed by Zendesk Inc. for

Potentiallife Limited for the purposes of contacting and providing technical support to users. Contact forms which utilize Zendesk are labeled as so. Data entered into any other contact form will not be condition to Zendesk processing and storage. There is no transfer of this personal data to third parties.

## Data processing

In summary, Potentiallife Limited processes data to:

- successfully deliver the Potentiallife program
- fulfill the interests of our clients and users
- fulfill contractual and legal obligations.

The reason for any processing should always be clear to the data subject.

## Legal basis for the processing

Typically the legal basis for data processing is defined by terms in the contractual agreement between Potentiallife Limited and the client organization (data controller) and the client organization is responsible for the gathering of consent from their employees (the data subjects).

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Potentiallife Limited may be subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and their name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. It is considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

## The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

## Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

## Personal data as statutory or contractual requirement

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with them or their organization. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject will be informed whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

## Routine erasure and blocking of personal data

Potentiallife Limited shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which Potentiallife Limited is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

## Existence of automated decision-making

As a responsible company, we do not use automatic decision-making or profiling.

## Contact us

Potentiallife Ltd.  
29-31 Oxford Street  
W1D 2DR London  
United Kingdom.

Email: [privacy@potentiallife.com](mailto:privacy@potentiallife.com)

Website: <https://potentiallife.com>

## Changes to this policy

If there are any material changes to this Policy, you will be notified by a representative of Potentiallife. Your continued use of the Websites or the Services constitutes your agreement to be bound by such changes to this Policy. Your only remedy, if you do not accept the terms of this Policy, is to discontinue use of the Websites and the Services.

## Appendix A: Definitions

The data protection declaration of the Potentiallife Limited is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

### Personal data

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

### Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

### Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.



## Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

## Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

## Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

## Third party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## Appendix B: Rights of the data subject

### Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

### Right of access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- 1) the purposes of the processing;
- 2) the categories of personal data concerned;
- 3) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- 4) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- 5) the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- 6) the existence of the right to lodge a complaint with a supervisory authority;
- 7) where the personal data are not collected from the data subject, any available information as to their source;
- 8) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

## Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

## Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- 1) The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- 2) The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- 3) The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- 4) The personal data have been unlawfully processed.
- 5) The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- 6) The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Potentiallife Limited, he or she may, at any time, contact any employee of the controller. An employee of Potentiallife Limited shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is

not required. An employee of Potentiallife Limited will arrange the necessary measures in individual cases.

## Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- 1) The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- 2) The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- 3) The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- 4) The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by Potentiallife Limited, he or she may at any time contact any employee of the controller.

## Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of the controller.

## Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

The controller, and by extension Potentiallife Limited shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Potentiallife Limited for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of the Controller. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

## Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of the controller.

## Appendix C: Technical Explanations

To help you better understand the technologies involved when using services provided by Potentiallife Limited the following non-technical explanations are provided.

### Cookies

The Internet pages of Potentiallife Limited use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, Potentiallife Limited can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

### Newsletter and Transactional Email Tracking (Tracking Pixels)

The newsletters and transactional emails of Potentiallife Limited contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such emails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns, in addition to assisting in support cases as well as gauging overall engagement. Based on the embedded tracking pixel, Potentiallife Limited may

see if and when an email was opened by a data subject, and which links in the email were called up by data subjects.

External links contained in the email could be subject to link forwarding, also known as click tracking. This technical process is the act of substituting external links with a unique link generated for the recipient which will record whether or not it was clicked. Once clicked the tracking enabled link forwards the user to the original link.

Such personal data collected in the tracking pixels or click tracking contained in the emails are stored and analyzed in order to optimize the shipping of the newsletter or transactional email, as well as to adapt the content of future emails to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke their respective declaration of consent. After a revocation, these personal data will be deleted by the controller. Potentiallife Limited automatically regards a withdrawal from the receipt of the newsletter as a revocation.

## Appendix D: Data Protection Provisions

Potentiallife Limited utilises the following third party providers in order to deliver a high quality online experience. These third parties provide functions and procedures per our instructions on our behalf.

Non-technical	Technical
<ul style="list-style-type: none"><li>● Zendesk, Inc. (embedded)</li><li>● YouTube LLC (embedded)</li><li>● Twitter, Inc. (embedded)</li></ul>	<ul style="list-style-type: none"><li>● Amazon Web Services, Inc.</li><li>● Google Inc.</li><li>● Bugsnag</li><li>● Mailchimp (Mandrill, The Rocket Science Group LLC)</li><li>● VIA Strength Survey (VIA Institute on Character)</li></ul>

### Application and use of Google Analytics

Potentiallife Limited has integrated the component of Google Analytics. Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports only available to Potentiallife Limited, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a cookie on the Internet browser of the data subject. The definition of cookies is explained in [Appendix C: Technical Explanations "Cookies"](#). With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of the Internet sites, which is operated by Potentiallife Limited and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of reporting and analytics. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks.



The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

## Application and use of Twitter

Potentiallife Limited has integrated components of Twitter on the landing page (Potentiallife.com). Twitter is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, which are limited to 280 characters. These short messages are available for everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who follow a user's tweets. Furthermore, Twitter allows you to address a wide audience via hashtags, links or retweets.

The operating company of Twitter is Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES.

With each call-up to one of the individual pages, which is operated by the controller and on which a Twitter component (Twitter feed) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Twitter component of Twitter. During the course of this technical procedure, Twitter gains knowledge of what specific sub-page of our website was visited by the data subject. The purpose of the integration of the Twitter component is to show the content of Potentiallife Limited's online Twitter profile embedded on the website.

If the data subject is logged in at the same time on Twitter, Twitter detects with every call-up to our website by the data subject and for the entire duration of their stay on our Internet site which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Twitter component and associated with the respective Twitter account of the data subject. If the data subject clicks on one of the Twitter buttons integrated on our website, then Twitter assigns this information to the personal Twitter user account of the data subject and stores the personal data.

Twitter receives information via the Twitter component that the data subject has visited our website, provided that the data subject is logged in on Twitter at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Twitter component or not. If such a transmission of information to Twitter is not desirable for the data subject, then he or she may prevent this by logging off from their Twitter account before a call-up to our website is made.

The applicable data protection provisions of Twitter may be accessed under <https://twitter.com/privacy?lang=en>.

## Application and use of YouTube

On this website, Potentiallife Limited has integrated components of YouTube. YouTube is an Internet video portal that enables video publishers to upload and publish video clips free of charge, which also provides free viewing, review and commenting on them. YouTube allows you to publish all kinds of videos, so you can access both full movies and TV broadcasts, as well as music videos, trailers, and videos made by users via the Internet portal.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, UNITED STATES. The YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by Potentiallife Limited and on which a YouTube component (YouTube video) was integrated, the

Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding YouTube component. Further information about YouTube may be obtained under <https://www.youtube.com/yt/about/>. During the course of this technical procedure, YouTube and Google gain knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in on YouTube, YouTube recognizes with each call-up to a sub-page that contains a YouTube video, which specific sub-page of our Internet site was visited by the data subject. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data subject.

YouTube and Google will receive information through the YouTube component that the data subject has visited our website, if the data subject at the time of the call to our website is logged in on YouTube; this occurs regardless of whether the person clicks on a YouTube video or not. If such a transmission of this information to YouTube and Google is not desirable for the data subject, the delivery may be prevented if the data subject logs off from their own YouTube account before a call-up to our website is made.

YouTube's data protection provisions, available at <https://policies.google.com/privacy>, provide information about the collection, processing and use of personal data by YouTube and Google.

## Application and use of Zendesk

Potentiallife Limited utilizes Zendesk Support on selected websites which require user authentication by the means of embedding. Zendesk Support is a user support ticketing tool which assists our support staff in responding to support queries and delivering higher quality answers to our users about our services. It also serves as an excellent channel for Potentiallife Limited to receive bug reports from active users, or any other communication or feedback. Its purpose is to be easily available and accessible in the case of any authenticated user requiring assistance during their use of our websites and services.

The operating company of Zendesk Support is Zendesk, Inc., 1019 Market St., San Francisco, CA 94103, UNITED STATES.

When the embedded Zendesk dialog is presented to the user a visible Zendesk label will be included, informing the user of Zendesk's involvement in that technical process. The dialog will be pre-filled with the authenticated users' name and email address which can be further edited if desired. To enable our support staff to respond to a support query it is important that a valid email address is entered, Potentiallife Limited will use this email address and name for the purposes of personalising and responding to the support query, as well as verifying the existence of the online profile on our systems. In addition the Zendesk dialog permits the user to enter a textual description of the issue they are experiencing, and optionally facilitates for file

attachment uploads to assist the user in demonstrating their issue by for example attaching screenshots.

Delivering outstanding support and eliminating pain points in the usage of our services is of utmost importance for Potentiallife Limited. Understanding where our users are experiencing these issues helps us internally prioritise our product development so that we can continue to publish impactful improvements. In order to achieve this we continually categorise incoming enquiries based on their textual description for the purpose of assessing commonalities.

With each call-up to one of the individual pages of this Internet site, which is operated by Potentiallife Limited and on which a Zendesk component (Zendesk dialog) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding component. Further information about Zendesk may be obtained under <https://www.zendesk.co.uk/about/>. During the course of this technical procedure, Zendesk gain knowledge of what specific sub-page of our website was visited by the data subject.

Zendesk's data protection provisions, available at <https://www.zendesk.co.uk/company/customers-partners/privacy-policy/>, provide information about the collection, processing and use of personal data by Zendesk.

## Application and use of Amazon Web Services

Potentiallife Limited makes use of Amazon Web Services ("AWS") as a provider of cloud based infrastructure and is a component which makes up part of Potentiallife's private cloud. This infrastructure is what drives our online services and websites, and consists of technical instruments such as servers, firewalls, databases, storage systems, backups, asset distribution networks and other services that might be required for our services to function optimally. Utilising providers of cloud infrastructure allows us to rapidly implement and integrate technical innovations to increase functionality and resilience.

The operating company of Amazon Web Services ("AWS") prior to July 1, 2018, is Amazon Web Services, Inc., 410 Terry Avenue North, Seattle, WA 98109-5210, UNITED STATES. Amazon Web Services, Inc. is a subsidiary of Amazon.com Inc, 410 Terry Avenue North, Seattle, WA 98109-5210, UNITED STATES. Following July 1, 2018 the operating company of AWS is Amazon Web Services EMEA SARL d/b/a "AWS Europe", 5 rue Plaetis L-2338 Luxembourg. AWS Europe is a subsidiary of Amazon EU SARL, 5 rue Plaetis L-2338, Luxembourg.

Potentiallife Limited sets out explicit instructions when managing or creating new infrastructure for AWS to follow as per the Data Processing Agreement between AWS and Potentiallife Limited. There is no transfer of personal data to third parties.

AWS' data protection provisions, available at <https://aws.amazon.com/privacy/>, provide information about the collection, processing and use of personal data by Amazon Web Services.

## Application and use of Mailchimp and Mandrill

Potentiallife Limited uses Mailchimp for managing and distributing our email based newsletter, and have integrated with Mandrill for the purpose of transactional emails, these are emails which are based on user actions such as completing a form on the website or requesting a password reset.

The operating company of Mailchimp and Mandrill is The Rocket Science Group LLC d/b/a "Mailchimp", 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, UNITED STATES.

When signing up for any of our newsletters their email address will be stored with Mailchimp for the purposes of distributing the newsletter to the recipient that signed up. Each individual email sent in context of the newsletter will contain an unsubscribe link which the subscriber can use to signal that they don't want to receive these newsletters anymore, once clicked emails will cease to be sent. You can read more about our newsletter at [Data Collection, Subscription to our newsletters](#).

Registered users of our services and offerings could be subject to their email being processed by Mandrill for the purposes of delivering transactional emails that are relevant to the registered users recent activity and behaviour on our platform. These serve as a method for engagement with our users with the aim to assist them in reaching their personal development goals while partaking in our services. This processing could also be required due to contractual agreements such as in a business-to-business relationship. Should a registered user wish to not receive these email based notifications then they can contact their employer if applicable, or Potentiallife staff.

Utilising Mailchimp and Mandrill allows Potentiallife Limited to take advantage of the well maintained and reputable IP address for the purposes of ensuring the highest chances of the email arriving in the recipients inbox and not be miscategorised as spam. These providers also enables Potentiallife Limited with insight into the deliverability of the emails sent, as well as statistics such as the number of opens and the number of clicked external links of the individual email. This is enabled through technologies such as pixel tracking and link forwarding, you can read more about these technologies in [Appendix C: Newsletters and Transactional Email Tracking](#).

Mailchimp's data protection provisions, available at <https://mailchimp.com/legal/privacy/>, provide information about the collection, processing and use of personal data by Mailchimp.

## Application and use of VIA Survey

Potentiallife Limited has integrated the VIA Survey into select parts of our Internet sites and services. The VIA Survey is an online and scientifically validated survey of personal character strengths and is part of our behavioural change platform. This integration allows for our registered users to complete the survey without having to carry out a separate registration process with the goal of not distracting them from their goals while using our online services. When the survey is completed our systems will send this to the VIA Survey which will respond with a string of character strengths which will then be presented back to the user which completed it, and no one else.

The operating company of VIA Survey is VIA Institute on Character, 312 Walnut Street, Suite 3600, Cincinnati, OH 45202, UNITED STATES.

VIA Institute on Character anonymises and stores this survey data for ongoing research purposes. Potentiallife Limited only stores the result of the survey for the purposes of displaying them to the user which completed it.

VIA Institute on Characters' data protection provisions, available at <http://www.viacharacter.org/www/About-Institute/Privacy-Policy>, provide information about the collection, processing and use of personal data by the VIA Institute on Character.

## Application and use of Bugsnag

For the purposes of monitoring the overall health of our Internet sites and online services Potentiallife Limited has integrated Bugsnag. Bugsnag is a small application which is integrated in our Internet sites, servers and mobile apps. Its purpose is to report any errors that occur on our platform to enable Potentiallife Limited to proactively combat bugs and logical errors in an effort to continually improve and monitor the overall stability of our systems.

The operating company of Bugsnag is Bugsnag, Inc., 939 Harrison Street, San Francisco, CA 94107, UNITED STATES.

When a user encounters a bug or error Bugsnag will report this event to Potentiallife's online Bugsnag profile which is only accessible by appropriate technical staff of Potentiallife Limited. Depending on how the bug was encountered, and whether or not the user was authenticated at the time, personal data to identify the user (such as registered email address or uniquely generated user ID) and a technical diagnostic is transmitted for the purposes of identifying who experienced the issue and to enable us to recreate it in order to ultimately correct the error.

Bugsnag's data protection provisions, available at <https://docs.bugsnag.com/legal/privacy-policy/>, provide information about the collection, processing and use of personal data by Bugsnag, Inc.