KINSHIP PRIVACY NOTICE · LEGAL

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Kinship Privacy Notice

How Kinship handles your information

Who's responsible: Legacy FS Limited ("Kinship") is the controller for the information in this notice: your account, payments and complaints, and the information about the Plan Member that we use to provide the Kinship Plan and Kinship visits. No other company is responsible for it.

What we collect: account and checkout details (name, email, phone, country); identity-verification information where an account needs it (documents and selfie, processed by our verification provider, Sumsub, acting as our processor); plan and payment information (card details are collected and stored by our payment provider, Stripe - we never hold full card numbers); your kin network as you build it; app usage.

Website forms, the Care Kit and messages: when you download the Care Kit, start a plan, ask for visits, book a call or send us a message on withkinship.ai, we collect what you type in: your name, email, WhatsApp or phone number, where you and the person you are looking after live, and how you found us (for example the advert or link you came from). We use it to give you what you asked for, to follow up about it by email or with a short WhatsApp message, and to see where people need Kinship so we know where to open next. If you'd rather we didn't contact you on WhatsApp, reply to say so and we'll stop. When we message you on WhatsApp, WhatsApp (part of Meta) carries that message under its own terms. The Care Kit form also tells you we'll send occasional email notes; every email has an unsubscribe link, and you can unsubscribe with one reply.

How we keep track of our contact with you: so that we don't contact you twice and can follow up at the right time, we keep a record of our contact with you: the emails we send you, whether they arrived and were opened, and which links in them you clicked (our email provider, Loops, reports this to us); when you open a payment link we have sent you; and when our team emails, messages or calls you, and when you reply. We also keep short notes of what we've talked about, including by email, so anyone on our team can pick up where we left off. Technology helps us turn emails into these notes, and a member of our team checks each one. If you mention someone's health, we only note what we need to help with what you asked. You can ask us to stop by emailing privacy@withkinship.ai.

Advertising and measurement: we advertise on Facebook and Instagram (Meta). If you accept advertising cookies on withkinship.ai, Meta's pixel on our site and our own server tell Meta when you download the Care Kit, start a plan or pay, so we can see which adverts work and show Kinship to people like our members. With the same consent, we may share your email address or phone number with Meta in hashed (scrambled) form so that Meta can show you Kinship adverts, or stop showing you adverts for something you already have. Meta matches the hashed details against its own accounts and, under its terms, deletes them after matching. We never share the Plan Member's information, visit

reports or anything about health for advertising. You can change your cookie choice at any time using the link at the bottom of any page, or ask us to stop by emailing privacy@withkinship.ai.

The Plan Member's information: when you set up a Plan for someone else, you give us their name, phone number, where they live, their relationship to you and, if you choose, their age and email. If the Plan includes visits, you also give us the address the visits go to. We use this to contact the Plan Member, introduce ourselves and agree visits with them. Please only set up a Plan for someone who knows about it and is happy for us to contact them.

Kinship visits and reports: our visitors are qualified nurses and other trained people in Lagos working with us under written contracts. They see what they need for the visits they make: the Plan Member's name, address, contact details and previous visit reports. After each visit the visitor writes a report, which the Plan Member's Kinkeeper reads before it's sent. Reports can include information about the Plan Member's health and wellbeing, such as mood, mobility, eating and medicines. We only record and share that with the Plan Member's explicit consent, which we ask for when we first speak to them, and they decide which family members receive reports. The Plan Member can change that, or withdraw consent, at any time by telling us.

Supporters: if you chip in to someone's Plan, we hold your name, email, the amount you chip in and your payment history (your card is held by Stripe). The person who set up the Plan sees that you've joined and whether your chip-ins have been taken; you see only what the Plan Member chooses to share.

Identity verification: where an account needs it (for example before certain payments or payouts, or where the law requires it), we verify identity through our verification provider, Sumsub, acting as our processor. Today a Plan paid by card doesn't need it.

Why (and the lawful basis): to run your account and plans, take payments and chip-ins, and arrange visits (contract); to record and share health and wellbeing information in visit reports (the Plan Member's explicit consent); to keep the Plan Member and our visitors safe, including contacting emergency services or someone the Plan Member has named if there's a serious risk (vital interests / legitimate interests); to verify identity, enforce role eligibility and prevent fraud (legal obligation / legitimate interests); to handle complaints (legitimate interests / legal obligation); to process and reconcile refunds, which are recorded in our ledger and periodically reconciled (contract / legal obligation); to reply to your enquiry or Care Kit request and follow up on it by email or WhatsApp (legitimate interests); to keep a record of our contact with you, including short notes of what we've talked about (legitimate interests); to improve the product (legitimate interests); to show you Kinship adverts and measure them, including sharing hashed contact details with Meta (consent, given through our cookie banner and withdrawable any time); marketing emails only with your consent - a separate, unticked choice, withdrawable any time.

Sharing and transfers: with our visitors and Kinship team members in Nigeria, so that visits happen. Nigeria is not covered by a UK adequacy decision, so this happens under written contracts with the safeguards UK law requires, and we also follow the Nigeria Data Protection Act 2023 for information used in Nigeria. With family members the Plan Member has agreed should receive reports. With a

partner clinic in Lagos, if the Plan Member takes up a health assessment under one of our offers: their name and phone number to book it, and anything more only with their agreement; the clinic handles the assessment and its results under its own privacy terms. With Meta, in hashed form and only with your advertising consent, as described under Advertising and measurement. With our service providers (verification, payments, hosting, email, call booking, messaging and tools that help us organise our correspondence) under contract; they may only use your information to provide their service to us. Some of them are in the United States, and where your information leaves the UK it is protected by contracts with the safeguards UK law requires. Never sold.

Complaints: if you complain, we process what you tell us to investigate and respond, and we keep a record of the complaint and its outcome for as long as we need to show how it was handled and to meet our obligations.

Who we are: Legacy FS Limited, trading as Kinship, registered with the Information Commissioner's Office (registration ZC223785).

Your rights: access, correction, deletion, portability, objection - in Settings or by contacting privacy@withkinship.ai. If a self-serve option isn't available in the app yet, contact us and we'll handle your request directly. The Plan Member has the same rights over their own information, including their visit reports. You can also complain to the ICO, and someone in Nigeria can also complain to the Nigeria Data Protection Commission.

Retention: we keep information only as long as we need it for the purposes above - account information for a set period after your account closes, identity-verification records for as long as the law requires (with a shorter period where an account never transacts), visit reports for as long as the Plan runs and a set period after it ends, enquiry and Care Kit details for as long as they are useful for following up (and deleted sooner if you ask), and complaint records and our refund and reconciliation ledger entries for as long as accounting and regulatory rules demand. We're finalising the detailed retention schedule and will publish it in this notice.