

Privacy Policy

This privacy policy is to let you know how Gaia gathers and processes your personal information.

This notice provides you with information about your rights and obligations and explains how, why and when we collect and process your personal data.

We take personal data seriously. Anything containing personally identifiable information is kept safe and we have put in place appropriate technical and other security measures to protect it.

We need to collect certain types of information to allow us to make a decision on your request for financial and insurance products. We also need to comply with legal and regulatory requirements relating to anti-fraud, anti-money laundering, know your customer and responsible lending obligations.

We will only collect the information we need to be able to provide you with the service you have requested. You need to make sure that the information you provide is accurate, complete, and not misleading. Your personal information may need to be disclosed when we are obliged to by law, for purposes of national security, taxation, defence of a legal claim or criminal investigations.

Who are we?

We are Gaia Fertility Ltd.

Our registered office is at Great Western Studios, 65 Alfred Rd, London W2 5EU, UK.

We are registered in England and Wales under company number 12009812.

We are registered on the Information Commissioner's Office (ICO) Register under number CSN6144773.

We can be contacted:

- By post at 65 Alfred Road, London, W2 5EU
- By email at contact@gaia.family

Data Protection Officer:

[Ines Cheaib](#)

65 Alfred Road

London, W2 5EU

ines@gaia.family

This privacy policy covers our processing of personal data which relates to the following categories of data subjects.

- **Member** is a person who has signed a Gaia Membership agreement

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- **Friend** is a person who has registered interest in Gaia and its related product
- **Visitor** is a person who has visited Gaia website

Data includes details such as your name, email address, address and product interests.

What personal data do we collect?

The personal data we collect about you depends on the purpose for which you engage with us. We may collect and use the following data about you:

1. **Identity** - full name, marital status, title, date of birth.
2. **Contact** - address, email address, telephone number(s), Gaia profile data.
3. **Financial** - bank account and payment card details.
4. **Transaction** - details about payments to and from you.
5. **Usage** - details about how you use our website.
6. **Marketing and Communications** - your preferences in receiving marketing from us and your communication preferences.
7. **Technical** - internet protocol (IP) address, Gaia log in details, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
8. **Medical** - health & lifestyle data, see 'Sensitive Personal Information' below.

Special Category Personal Data

Sometimes we will request or receive Personal Information that is sensitive and we call this “special category personal data.” The types of Sensitive Personal Information that we hold and process include:

- Health and lifestyle data – including details of pre-existing or past medical conditions, your family medical history, details regarding appointments and consultations with medical professionals, diagnoses, medical records, whether you do or have ever smoked, details regarding alcohol consumption

Conditions for processing special category data

- We will only process this data with explicit consent from the user. We may collect this data and your explicit consent, either before or after entering into a contract and providing The Gaia Plan. Additionally, where we collect additional sensitive health and lifestyle data throughout the course of your engagement with us, we will always ensure that we have your explicit consent to do so.

When is data collected?

1. Directly from the data subject. Through:
 - a. Direct interactions. You may give us your Identity, Contact and Financial Data through forms or by corresponding with us through website, chat, phone, email or otherwise. This includes personal data you provide when you:
 - i. Create an account on our website;
 - ii. Speak to our advisor;
 - iii. Enquire about our products;

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- iv. Request marketing to be sent to you;
 - v. Give us feedback or contact us.
 - vi. We may also request a scan of an identity document if this is required for “know your customer” or anti-money laundering purposes.
2. Indirectly from the data subject for example device and website usage data
 - a. Data collected about your use of our websites. Information about your device, network, and web activity.
 - We collect personal information about you when you access our website, register with us, contact us, send us feedback, purchase products or services via our website, post material to our website and complete customer surveys via our website.
 - We collect this personal information from you either directly or indirectly, such as your browsing activity while on our website.
 3. From a third party (see the ‘Third parties we collect personal data from’ below)

To make it clear, here are the definitions and uses of

- “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, read our cookie policy on gaiafamily.com.
- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site. More information about the use of these can be found in our cookie policy.

Here is the top line summary of the data we collect.

When we use your personal information, we are required to have legal basis for doing so. There are various legal bases on which we may rely, depending on what personal information we process and why.

We’ll break down the information further in the next sections. To use our full range of services and products, we will collect some or all of the following information:

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To provide the Treatment Pathway Report to you	(a) Identity (b) Contact (c) Medical	(a) Performance of a contract with you (b) Explicit consent (in relation to any Medical Data we need to process in order to provide the Treatment Pathway Report to you)
To provide The Gaia Plan to you, including:	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

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<ul style="list-style-type: none"> (a) To manage payments, fees and charges (b) To collect and recover money owed to us 	<ul style="list-style-type: none"> (d) Medical 	<ul style="list-style-type: none"> (c) Explicit consent (in relation to any Medical Data we need to process in order to provide the Gaia Plan to you)
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Notifying you about changes to The Gaia Plan's terms and privacy policy (b) Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications (d) Medical 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use The Gaia Plan) (d) Explicit consent (in relation to any Medical Data we need to process in order to manage our relationship with you)
<p>To enable you to complete a survey or provide us with feedback</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Medical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (to study how customers use our service, to develop them and grow our business) (b) Explicit consent (in relation to any Medical Data we may collect through a survey)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
<p>To deliver relevant website content and marketing materials to you and measure to understand the effectiveness of the marketing we send you</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical (f) Medical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy) (b) Consent
<p>Carry out data analysis: including to ensure data accuracy and quality and for insurance risk modelling and product and pricing refinement.</p>	<ul style="list-style-type: none"> (a) Technical (b) Usage (c) Medical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (to define types of customers for The Gaia Plan, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) (b) Explicit consent (in relation to any Medical Data we need to process in order to carry out this analysis)
<p>To make suggestions and recommendations to you about The Gaia Plan that may be of interest to you</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage (e) Medical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (to develop The Gaia Plan and grow our business) (b) Explicit consent (in relation to any Medical Data we need to process in order to make these suggestions and recommendations)

Manage commercial risk including by taking out and maintaining appropriate insurance	(a) Identity (b) Contact (c) Medical	(a) Necessary for our legitimate interests (to develop The Gaia Plan and grow our business) (b) Explicit consent (in relation to any Medical Data we need to process for these purposes)
Archiving, scientific, or historical research or statistical purposes	(a) Medical	Explicit consent

Our use of third parties

Third parties we collect personal data from

Third parties assist us in our marketing efforts and to deliver our products to you and in the provision of our services. We collect this personal data by using cookies, server logs, visit statistics such as Google Analytics and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details. We may also record within the browser information necessary for the functioning of the website, for example whether cookie consent has been agreed to or progress through online form.

In order to process your application and provide you with a Gaia Plan, we will perform a credit check which includes sharing and obtaining personal information from credit reference agencies (CRAs) and Open Banking tools. Information they will give us information includes your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at www.transunion.co.uk/crain. More information about Credit Kudos' activities are available in their privacy policy (<https://www.creditkudos.com/legal/privacy>).

What third parties we currently use

Google Analytics

Google Analytics allows us to see how users are finding out about Gaia and if our use of social or paid campaigns are working to draw users to sign up to our platform.

You can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

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Segment

Segment acts as an intermediary between the third parties and uses cookies to connect this data. It connects your information, so we know if you've been sent a reminder or allows us to review how customers use our site to improve your experience.

You can read more about how Segment uses your Personal Information and opt-out at: <https://segment.com/legal/privacy/> or by emailing privacy@segment.com.

Sentry

Sentry allows us to fix and optimise the code that keeps Gaia running. To monitor if there are any errors or ways that we can make your experience smoother, Sentry may collect information including how you interact with Gaia using cookies and monitoring to see that all sensitive information (including financial information) is confidential and encrypted. No private information is stored on Sentry's servers.

You can read more about how Sentry uses your Personal Information here: <https://sentry.io/privacy/>. You can also opt-out of Sentry at security@sentry.io or by <https://sentry.io/contact/support/>.

Amazon Web Services (AWS)

AWS is an industry-standard cloud service provider which we build our platform on and provide our web services through.

You can read more about how AWS uses your Personal Information here: <https://aws.amazon.com/privacy/>.

Google Cloud Services

Google Cloud Services is a suite of cloud computing services that provides a series of modular cloud services including computing, data storage, data analytics and machine learning.

You can read more about how GCS uses your Personal Information here: <https://cloud.google.com/security/privacy>.

Typeform

Typeform is an online software service that specialises in online form and survey building.

You can read more about how Typeform uses your Personal Information here: <https://admin.typeform.com/to/dwk6gt>.

Zapier

Zapier is a service that integrates various web applications into one platform.

You can read more about how Zapier uses your Personal Information here:
<https://zapier.com/privacy>.

Third Parties We Share Your Data With

We may share your Identity and Financial Data with our payment processors

Partner Clinics: we might share data with the clinic you go to for treatment. This data might include medical data, identity and contact information. We will only share it with your treatment clinic where we have explicit consent to do so.

Insurers: Beazley Furlonge Ltd and other insurance market participants help us provide you an insurance cover. When you give us your consent to the use of your personal information and your partner's, if applicable, we might share data with the insurers to issue you an insurance policy in connection with your Gaia Plan. You do not have to give your consent and you may withdraw your consent at any time. However, if you do not give your consent, or you withdraw your consent, this may affect our ability to provide the insurance cover from which you benefit and may prevent the provision of cover for you or handling your claims.

We only allow third parties to handle your personal data if we are satisfied, they take appropriate measures to protect your personal data. We also impose contractual obligations on our service providers, to ensure they can only use your personal data to provide services to us and to you.

We may disclose your personal data to law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring. Usually, data will be anonymised, but this may not always be possible. The recipient of the data will be bound by confidentiality obligations.

International Data Transfers

To provide products and services to you, it is sometimes necessary for us to share your personal data outside the UK, for example, with our service providers located outside the UK.

These transfers are subject to special rules under UK data protection law, as non-UK countries are not subject to the same data protection laws as the UK.

We will, however, ensure the transfer complies with data protection law and all personal data will be secure. Unless the location we are transferring personal data to has been deemed to provide personal data with an adequate level of protection, for example EEA countries, our standard practice is to enter into Standard Contractual Clauses with the relevant data importer.

We will only ever send your data outside of the UK to:

- Follow your instructions (e.g., right to portability); or
- Comply with a legal duty; or
- Work with our agents and advisers who we use to help run your accounts and services

Your data rights and preferences

Do Not Track

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

Retention of Data

We will retain your personal data for as long as we are required to under relevant legislation and regulation, and where no specific rules apply, for no longer than it is necessary for our lawful purposes. This will usually be no more than six years from the end of our relationship with you. The retention period of your personal data may need to be extended where we require this to bring or defend legal claims.

We may also retain data for longer periods for statistical purposes, and if so, we will anonymise this.

Why do we collect and store data?

We will keep your personal information for as long as is necessary to fulfil the purposes outlined in this privacy policy, unless we are required or permitted by law to retain that information for longer than this.

We will need to keep your personal information for as long as you are a customer. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

How long do we store your data?

After your relationship with Gaia ends, we may keep your data for up to 6 years for the following scenarios:

- To respond to any queries or complaints
- To show that we have acted and treated you fairly
- To maintain records according to rules and regulations that apply to us

In some circumstances, we will keep your data for longer than 6 years if we cannot delete it for regulatory or legal reasons. If it is required to extend our retention period, we will continue to ensure that your privacy is protected, and we will only use it for the specified reasons.

Data Analysis and Research

Gaia will anonymise your information for health-related studies, or research or evaluation in which Gaia will participate. The types of data which may be used for analysis and research purposes include details about a patient (e.g. age, cause of infertility, lifestyle), lab results (e.g. blood test results, hormonal levels), information about cycle planning, the cycle itself, the stimulation phase and egg collection (e.g. stimulation treatment, number of follicles, number of collected eggs), information about embryology and the embryo transfer, results of ultrasound scans, and details about the success or otherwise of a pregnancy.

Once information is truly anonymised, it does not relate to a person, and it is impossible to identify a person from that data. As a result, this type of information falls outside data protection laws.

The purposes for which Gaia will use this analysis and research information are:

- To report on Gaia's performance based on statistical studies (e.g., pregnancy rate, birth rate, etc.). Any reporting information will be aggregated, and it will never be possible to identify you from this.
- Improve Gaia's services to you

How can you amend your marketing preferences?

Both when you enter our site or sign up as a user, we will confirm that you have opted into our services. Any electronic marketing communications we send you will include clear instructions to follow should you wish to unsubscribe at any time.

You may also amend your contact preferences by emailing us at contact@gaia.family.

Your Rights

As a data subject, you have a number of rights:

- the right to be informed about the collection and use of your personal data;
- the right to access the personal data we hold about you (Subject Access Request);
- the right to rectify inaccurate personal data or complete it if it is incomplete;
- the right to erasure and have your personal data deleted;
- the right to request restriction of or suppression of your personal data;
- the right to withdraw consent where data is being processed under this lawful basis
- the right to obtain and make use of your personal data for your own purposes across different services ("portability");
- the right to object to the processing of your personal data in certain circumstances;
- and
- rights related to automated decision-making including profiling.

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Your data protection rights are subject to certain restrictions and conditions and financial organisations are required to retain a range of your information for legal and regulatory reasons including responsible lending and the prevention of financial crime.

If you think that any of the personal data, we hold about you is wrong or incomplete you have the right to challenge it.

We will not make a charge for handing your rights request unless we consider it to be manifestly unfounded or excessive involving a disproportionate effort (particularly if this is a repeated request). If you would like to exercise any of the rights outlined above, you can make it in writing by emailing contact@gaia.family and we will respond within 30 days.

We will assess your request and if we decide not to act upon it or place certain restrictions on it, we will inform you of our reasons for this.

If you do not provide requested data, it may prevent you from entering into a contract with Gaia or delay the process of doing so.

You have the right to complain to us and to the data protection regulator, the Information Commissioner's Office. Their address is: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. They can be contacted by phone on 0303 123 1113 (local rate) or 01625 545745 if you prefer to use a national rate number.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation. You can find details on how to report a concern at: <https://ico.org.uk/make-a-complaint/>

Keeping your personal information secure

We are committed to ensuring that your information is secure. Appropriate security measures are in place to protect against loss, misuse or alteration of information collected from you, including measures to prevent, as far as possible, access to our databases by parties other than Gaia.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

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If you would like to know how to protect your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, please visit [Get Safe Online](#).

How do we link to other sites?

Our website may contain hyperlinks to websites that are not operated by us. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal information about yourself.

Changes

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. Updated versions of this policy will be posted on our website. If there are significant changes, we'll let you know by email.

Contact Us

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at: hello@gaia.family

If you would like this website privacy policy in another format (for example: audio, large print, braille) please contact us at: hello@gaia.family.