

# Privacy Policy

## Healy Telemedicine Platform

*Last Updated: April 8, 2026*

*Effective Date: April 8, 2026*

### 1. Introduction

Healy (“we,” “us,” or “our”) is committed to protecting your privacy and ensuring the security of your personal and health information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our AI-powered telemedicine platform (“Platform”) in Nigeria and across Africa.

#### Our Commitment

- We comply with the Nigeria Data Protection Regulation (NDPR) and international privacy standards
- Your health data is encrypted and protected with industry-standard security measures
- We never sell your personal or medical information to third parties
- You maintain control over your health information and who can access it

### 2. Information We Collect

#### 2.1 Personal Information

- **Name, email address, phone number**
- **Date of birth, gender, and contact details**
- **Government-issued identification (for verification purposes)**
- **Payment information (processed securely through Paystack)**
- **Emergency contact information**

#### 2.2 Health Information

- **Medical history and current health conditions**
- **Symptoms and health concerns shared during consultations**
- **Vital signs and health monitoring data**
- **Prescription information and medication history**
- **Consultation records and treatment plans**
- **AI triage assessment results**

#### 2.3 Technical Information

- **IP address and device information**
- **Browser type and operating system**
- **Pages visited and time spent on our Platform**
- **Cookies and similar tracking technologies**

- **Location data (with your explicit consent)**

#### **2.4 Communication Data**

- **Chat messages and video consultation recordings**
- **Email communications and SMS notifications**
- **Voice recordings during consultations**
- **File attachments and shared documents**

### **3. How We Use Your Information**

#### **3.1 Primary Purposes**

- **To provide telemedicine services and connect you with healthcare providers**
- **To facilitate AI-powered symptom assessment and triage**
- **To manage appointments, consultations, and follow-up care**
- **To maintain accurate medical records and treatment history**
- **To process payments and manage subscriptions**

#### **3.2 Secondary Purposes**

- **To improve our AI algorithms and service quality**
- **To conduct research and develop new healthcare features**
- **To ensure platform security and prevent fraud**
- **To comply with legal and regulatory requirements**
- **To provide customer support and technical assistance**

#### **3.3 Marketing and Communications**

- We only send you health-related communications and service updates
- You can opt-out of non-essential communications at any time
- We never use your health data for marketing purposes

### **4. Information Sharing and Disclosure**

#### **4.1 Healthcare Providers**

- Your information is shared only with healthcare providers you explicitly authorize
- Providers can only access information relevant to your treatment
- All provider access is logged and audited regularly

#### **4.2 Service Providers**

- **Payment processors (Paystack)** for transaction processing
- **Cloud infrastructure providers** for data storage and processing
- **Communication providers (Stream.io)** for video and chat services
- **AI service providers (OpenAI/Google)** for triage assessments (anonymized data only)

### 4.3 Legal Requirements

- We may disclose information when required by law or court order
- To protect our rights, property, or safety
- To prevent fraud or illegal activity
- In emergency situations to protect life or health

### 4.4 Research and Analytics

- Anonymized and aggregated data may be used for research
- No personally identifiable information is shared without explicit consent
- All research follows ethical guidelines and regulatory requirements

## 5. Data Security and Protection

### 5.1 Encryption and Security Measures

- **End-to-end encryption** for all communications and consultations
- **AES-256 encryption** for stored medical data
- **Secure socket layer (SSL/TLS)** for all data transmissions
- **Regular security audits and penetration testing**

### 5.2 Access Controls

- **Multi-factor authentication** for all user accounts
- **Role-based access control** for healthcare providers
- **Audit logging** for all data access and modifications
- **Session timeout** and automatic logout features

### 5.3 Data Storage and Retention

- **Data centers** located in secure facilities with 24/7 monitoring
- **Regular backups** with disaster recovery procedures
- **Data retention policies** compliant with medical record requirements
- **Secure data deletion** when requested or required by law

## 6. Your Rights and Choices

### 6.1 Access Rights

- **Right to access** your personal and health information
- **Right to request corrections** to inaccurate information
- **Right to receive copies** of your medical records
- **Right to data portability** in machine-readable format

### 6.2 Control Rights

- **Right to consent** to specific uses of your health data
- **Right to revoke consent** where legally permissible
- **Right to opt-out** of non-essential communications
- **Right to delete** your account and personal data (where legally allowed)

## 6.3 Exercise Your Rights

To exercise any of these rights, contact us at: - **Email:** [privacy@healy.ng](mailto:privacy@healy.ng) - **Phone:** +234-806-3055-417 - **Address:** [Your Physical Address in Nigeria]

## 7. Cookies and Tracking Technologies

### 7.1 Essential Cookies

- **Authentication cookies** to maintain your login session
- **Security cookies** to protect against fraud and unauthorized access
- **Functional cookies** to remember your preferences

### 7.2 Analytics Cookies

- **Usage analytics** to improve our services
- **Performance monitoring** to ensure platform reliability
- **Error tracking** to identify and fix technical issues

### 7.3 Your Choices

- You can control cookies through your browser settings
- Disabling essential cookies may affect platform functionality
- We respect “Do Not Track” signals where applicable

## 8. International Data Transfers

### 8.1 Data Location

- **Primary storage:** Nigeria-based data centers
- **Backup storage:** Secure facilities in compliant jurisdictions
- **Processing:** Limited to regions with adequate privacy protections

### 8.2 Cross-Border Transfers

- All international transfers comply with GDPR requirements
- Standard contractual clauses in place for international service providers
- Data remains protected to the same standard as in Nigeria

## 9. Children’s Privacy

### 9.1 Age Restrictions

- Our Platform is intended for users 18 years and older
- We do not knowingly collect information from children under 18
- Parents/guardians must provide consent for minor patients

### 9.2 Minor Patients

- Additional consent requirements for minors’ medical care
- Parental access to minor’s health information
- Special protections for adolescent privacy rights

## 10. AI and Automated Decision-Making

### 10.1 AI Triage System

- **Purpose:** Symptom assessment and urgency classification only
- **No medical diagnosis:** AI provides recommendations, not diagnoses
- **Human oversight:** All AI recommendations reviewed by qualified providers
- **Data anonymization:** Personal identifiers removed before AI processing

### 10.2 Your Rights

- **Right to human review** of AI-generated recommendations
- **Right to understand** how AI decisions are made
- **Right to opt-out** of AI features (with alternative service options)
- **Right to contest** AI decisions affecting your care

## 11. Data Breach Notification

### 11.1 Our Commitment

- We notify affected users within 72 hours of discovering a breach
- We provide clear information about what happened and what you should do
- We work with regulatory authorities to address security incidents
- We implement additional measures to prevent future breaches

### 11.2 Notification Process

- **Email notification** to affected users
- **Platform notifications** for active users
- **Public notification** for significant breaches
- **Regulatory reporting** as required by NDPR

## 12. Changes to This Privacy Policy

### 12.1 Updates and Modifications

- We may update this Privacy Policy periodically
- Material changes will be notified 30 days in advance
- Continued use of the Platform constitutes acceptance of changes
- We maintain a version history of all policy changes

### 12.2 How We Notify You

- **Email notification** for significant changes
- **Platform notifications** for logged-in users
- **Website banner** for prominent changes
- **Direct communication** for policy updates affecting your rights

## 13. Contact Information

### 13.1 Privacy-Related Inquiries

- **Email:** support@healy.ng
- **Phone:** +234-806-3055-417
- **Address:** Zaria Kaduna, Nigeria
- **Hours:** Monday-Friday, 9:00 AM - 5:00 PM WAT

### 13.2 Data Protection Officer

- **Email:** dpo@healy.ng
- **Phone:** +234-806-3055-417
- **Responsibilities:** Privacy compliance, data protection, user rights

## 14. Regulatory Compliance

### 14.1 Nigerian Regulations

- **Nigeria Data Protection Regulation (NDPR) 2019**
- **National Health Act** requirements
- **Medical and Dental Council of Nigeria** guidelines
- **Consumer Protection Act** provisions

### 14.2 International Standards

- **Health Insurance Portability and Accountability Act (HIPAA)** principles
- **General Data Protection Regulation (GDPR)** standards
- **ISO 27001** information security management
- **Health Level Seven (HL7)** healthcare data standards

## 15. Glossary of Terms

- **Personal Information:** Any data that can identify you personally
- **Health Information:** Medical history, conditions, treatments, and related data
- **Anonymized Data:** Data with all personal identifiers removed
- **Encryption:** Scrambling data to make it unreadable without a key
- **Consent:** Your explicit permission to use your information
- **Data Subject:** You, as the individual whose information we process

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**This Privacy Policy is part of our commitment to transparency and user privacy. By using Healy, you acknowledge that you have read, understood, and agree to this Privacy Policy.**

For questions or concerns about your privacy, please contact our Data Protection Officer at support@healy.ng or call +234-806-3055-417.