

Privacy Policy

Initial Effective Date: Feb 16, 2022 (GMT)

Latest Revised Date: Feb 13, 2026 (GMT)

Version: 4.1.2

You can read our child friendly privacy policy [here](#).

Our privacy policy explains what Haruki powered by Haruki (“we”, “our”, “us” or “Haruki”) does with your provided information when you use our apps and services. This privacy policy applies to services provided by our UK specific applications("apps"), namely Everyday Mental Health by Haruki mobile app("EMH App"), Digital Referral Assistant application("DRA" or "Referral web widget") and Therapist Companion ("Co-Pilot") If you are using our global Haruki mobile app then refer to this [privacy notice](#).

We provide multiple services as listed below. You will not have access to services not made available in your region. As an Institutional user, you will get access to only those services authorized by your Institution.

- Eligibility and clinical assessment submission services (“Digital Referral Assistant or DRA”)
 - A text or voice-based digital coach powered by an Artificial Intelligence chatbot (“Conversation Space”).
 - Clinically verified tools delivered over text or voice (“Care library”).
 - Safety referrals for CYP users- Children and Young People (“CYP referrals”).
- Ability to communicate with your Institution/ Clinician (“Therapist Companion” or "Co-Pilot").
 - Integrate with Institutions and their Service Providers EPR/Systems.

You are interacting with an AI software when using our AI services, and not a person. The Software cannot replace care from a qualified health professional.

We will work with your public institution, healthcare institution, educational institution, pharmaceutical organisations or other organisation to offer our services. These are called Institutional services. Before you can use these Institutional services, you will need to agree to our notices and to the notices of your Institution.

By using our app and services, you agree that we can use your information as described in this privacy policy and any other related [terms](#) and policies (“notices”).

1. About Haruki and Our Contact Details

Haruki is a company with offices in the UK, India, and the USA. In the UK, we are registered with the UK Information Commissioner's Office. Our registration number is ZB272754.

Where Haruki decides the purpose of personal data processing, we will be the data controllers. Where we perform personal data processing at the intent and direction of your Institution, we will be data processors.

If you have any questions, comments, complaints, or requests about our app and services, you can email us at Support@HarukiHealth.com.

2. What Information We Collect and Use

Depending on how you interact with us, we may collect personal data that can be used to identify you. Notably, personal data does not include publicly available information or anonymized or aggregated information.

When you use our app and services.

When you use our app and services, we collect the following information. You control the information you share with us. We design our app to collect as little personal data as possible to keep your data safe and protect your privacy. This means there is less risk of your information being misused. When you share information with us, we are responsible for taking care of it.

Information provided by you.

- **Information about you.** This includes things like your nickname, age-range, gender, pronouns, or identifiers you may voluntarily reveal about yourself.
- **Conversation data.** This covers what you type in messages, your challenges, preferences, feelings, moods, thoughts, task lists, and safety information. It also includes answers to surveys or questionnaires from us or your Institution, and how you respond to the tools and exercises that we offer.
- **Correspondence data.** If you email us, you might share personal data like your name, email address, home address, the company you are part of, your job title, and what you talk about in the message.
- **Feedback data.** When we ask for your thoughts on our app and services, we gather your contact info and some basic details about you.
- **Pharmacovigilance data.** This is only for services provided for pharmaceutical institutions. On behalf of your Institution, we may ask you to provide safety related inputs regarding your use of medications. This may include any drug side effects, adverse events or other experiences when using the Institution prescribed drugs. You will be routed to the Institution or regulator webpage where you can provide your inputs.

Information collected via automated means or by third parties.

- **Information sharing with your Institution.** Sometimes, your Institutions or their appointed representatives might share or ask you to share your personal data, such as your name, date of birth, Institution identifiers, contact details among others, so we can offer you our services. We may also share your usage and safety data with your Institution as part of our services.
- **App event data.** We collect information about what you do in the app, like where you tap, what actions you take, your settings, notifications you get, and the screens you visit.
- **Device data.** When you install the App, we get an ID for your device from the Google Play Store or Apple Play Store. We also collect information about your device, like the type of phone, its time zone, and its operating system. A service provider that helps us securely deliver content might also collect your IP address to help us provide our services.
- **Cookie Information.** We and our third-party providers collect information about your app use via cookies or similar technologies. We use mandatory or necessary cookies to provide our services.

When you use our DRA services

When you use the DRA on your Institution website to make a referral submission, we will need to collect some information on behalf of your Institution. This information is transferred to the Institution and/or their service providers for review by a clinician.

You can fill out the information required at your own pace. We will obtain your personal data directly from the Institution (such as member id, plan details, demographic information). We will also ask for personal details (such as name, date of birth, contact details), answers to health related questions, and any long-term health issues or disabilities within the DRA form itself. Your Institution decides if you qualify for these services, not us.

We do not decide who is accepted by the institution, nor the type or step of care provided. The DRA only collects the required information and passes it to your Institution and/or their authorized service providers.

When you use the CYP referral service as a CYP user

If you need extra safety-related support and help, you will be asked to fill in a form in the EMH App with your personal details and contact information. Based on the submission, a clinician from your Institution can get in touch with you. We use this information, on behalf of your Institution, to make sure you get the support you need.

When you use the LLM-enabled AI

LLM-enabled AI uses third-party Large Language Models (LLM”) and our own AI to chat with you. This helps the Conversation Space talk about varied conversations and provide responses that are more suited to you. Where provided, this allows you to chat in native English and other

languages. Your conversation data is processed to provide this service. We use LLM to process and classify conversation data for risks to ensure safer and improved conversational flows. The output from the LLM passes through our safety guardrails and quality checks before we use it. Every piece of content generated by the AI passes through our safety and quality checks, and all LLM based conversational prompts are designed and tested by clinicians to ensure that they are clinically safe and appropriate. Our staff review the appropriateness of the LLM response at frequent intervals to make sure they are safe, and work well.

When you join our testing or research initiatives

You can choose to sign up and join any of our online testing or research studies. When you volunteer, we will collect some information from you. These include:

- **Information about you.** This may include (but is not limited to) your name, contact details, country, gender, socio-economic details, age-range.
- **Health and Wellness data.** If you participate in our research study we may collect additional information such as ethnicity, alcohol/substance use concerns, mood, and validated assessment responses.

Sources of personal data

We get your personal data either from you, your Institution, or service providers your Institution asks us to work with.

3. How We Use Your Information

Legal grounds

We need to follow data protection laws that make sure we look after your personal data properly. Here is how and why we might use it:

1. **Consent:** Sometimes, we ask you if it is okay to use your personal data. You can always change your mind later if you decide you do not want us to use it anymore by writing to us.
2. **Contract Performance:** When you use our app or services, we might need some of your personal data to provide our services and make sure everything works properly.
3. **Legitimate Interests:** We and service providers we trust might use limited information to keep our services safe from fraud or security problems. We might also use it to make our services better. But do not worry, we will not use your information to train our AI.
4. **Legal Obligation:** Sometimes, we need to use your personal data to follow the law or to protect our company and the people who use our services.
5. **Public Interest:** Where applicable, we may collaborate with your Institution and share required information so they can process your data for the broader public health and interests.

Sometimes, we need to use special category data about you, like your mental health and well-being data. We will only do this if we follow the law and have a good reason, such as:

1. Reasons for substantial public interest: Helping you with advice or support, like counseling, or keeping you safe while you use our app and services.
2. Health Care: Acting on behalf of your Institution to provide healthcare.
3. Public health: Acting on behalf of your Institution to help with public health issues, under the guidance of a health professional.

Uses of your Information

We might use the information you give us on our apps and services for these reasons.

1. Information about you

- a. **To provide and manage app and services:** Here is how we use your information:
 - i. To recognize which institution you are part of.
 - ii. To recognize whether you are a new or existing user to the app and service.
 - iii. When needed, to ask your permission to turn on your device's microphone and camera.
 - iv. We collect, move, save, and use your provided information to make our services work.
 - v. We set up and keep track of your chats and use of our services.
 - vi. We give you content and tools that are right for your age and gender.
 - vii. We let you change your nickname.
 - viii. Where needed, we will connect with your Institution's approved systems to handle your information.
 - ix. We keep a record of any permissions you give us.
 - x. We let you know if we change our rules or privacy notice in the EMH App.

Legal grounds: For each purpose listed above we will rely on one among the following, contract performance, legitimate interests.

2. Use of Conversation data

- a. **To provide and manage app and services:** We do the following with your information:
 - i. We come up with ideas and create AI programs, stories, and ways to talk for our Conversation Space. We do not train our AI models using your conversation messages.
 - ii. The Conversation Space remembers the text messages you send and choices you make while using the apps.
 - iii. The Conversation Space figures out if you are feeling happy, sad, or have any problems or questions. This helps us chat with you safely and give you required resources.

- iv. The Conversation Space makes sure it understands you so that conversations make sense.
- v. The apps show you safe tools and techniques that can help you.
- vi. We make sure any personal details you accidentally share in your messages are removed and cannot be traced back to you.
- vii. The Conversation Space looks for any medical or emergency words in your messages to help keep you safe.
- viii. If the Conversation Space detects something that seems like an emergency, we may inform your Institution.
- ix. We give you information and resources shared by your Institution when you use the Therapist Companion service.
- x. When you use the Therapist Companion service, with your consent we share your conversation data with your Institution to help with your care. Any data involving safety or risk is shared automatically to ensure that your clinician is aware.

Legal basis: For each purpose listed above we will rely on one among the following, contract performance, legitimate interests, and consent. Use of appropriate additional conditions for any special category personal data.

- b. **To perform well-being assessments:** We do the following with your responses:
 - i. The Conversation Space will ask you about how you feel and your mental well-being from time to time.
 - ii. The Conversation Space recognizes if you inform any emergencies and may let your Institution know to provide support.
 - iii. The Conversation Space guides you to helpful helplines and support resources if you need them.
 - iv. The Conversation Space recommends tools, tips, and resources to help you to manage your mood and improve your wellbeing.

Legal basis: For each purpose listed above we will rely on one among the following, contract performance, legitimate interests. Use of appropriate additional conditions for any special category personal data.

- c. **To provide in-app notifications and reminders:** We will send you alerts inside the app if you choose to set reminders and notifications.

Legal basis: contract performance, consent.

- d. **For research, analytics, and compliance reporting:** We might remove details that show who you are so that no one can tell the information is about you. We will use this changed information to check how well our app is working and to see if it is safe and useful. Sometimes, we also share this information with regulators to make sure we are following the laws.

Legal basis: For each purpose listed above we will rely on one among the following, legitimate interests, legal obligations. Use of appropriate additional conditions for any special category personal data.

3. Use of Correspondence data

- a. **To communicate effectively with you:** We do the following with your responses:
 - i. We answer your questions, requests, complaints, and other feedback.
 - ii. We fix any problems with our services.
 - iii. We send you important service updates.
 - iv. We keep track of our conversations with you to make sure we are doing a good job and following the rules, and also to help train our team.

Legal basis: For each purpose listed above we will rely on one among the following, contract performance, legitimate interests.

4. Use of Feedbacks

- a. **To improve our app and services:** We do the following with your information:
 - i. To invite you to join activities like sharing your thoughts about our product, or helping us test it.
 - ii. To understand your feedback so we can make our product and services safer and better.
 - iii. To use your personal details to make sure everyone has a fair chance to join in and that we test our product with the right groups of people.

Legal basis: For each purpose listed above we will rely on one among the following, legitimate interests, consent.

5. Use of Pharmacovigilance data

- a. **For safety, and compliance reporting:** We do the following on behalf of your Institution:
 - i. To give you Institution-provided safety messages and resources about their drugs.
 - ii. To redirect you to your Institution or regulatory reporting website. These websites may collect and store your input on side effects, adverse events and other experiences when using the Institution prescribed medication or services.
 - iii. To transfer any collected inputs with your Institution and their approved third-party providers to assess the effectiveness of the pharmacovigilance messages.
 - iv. To send reminders about safety and reporting adverse events within the app.

Legal basis: legal obligations. Use of appropriate additional conditions for any special category personal data.

- b. **To provide Institutional services:** We do the following with your information:
 - i. Provide clinically reviewed well-being programs. These are supportive resources to help you manage the worry and stress that you may be experiencing as part of your condition or circumstances.
 - ii. Transfer anonymized app use data with your Institution and their authorized service providers.

Haruki will never make any references, directly or indirectly to use of medicines within their conversations with you.

Legal basis: For each purpose listed above we will rely on one among the following, contract performance, legitimate interests.

6. Regarding Information sharing with your Institution

- a. **To provide and manage apps and services:** We do the following for your Institution:
 - i. We may send you links or allow you to use codes so you can use the EMH App.
 - ii. To associate and maintain end-to-end continuity in your care when you use our apps.
 - iii. The apps may check to make sure you are part of your Institution.
 - iv. We share required reports and statistics with your Institution.

Legal basis: contract performance. Use of appropriate additional conditions for any special category personal data.

7. Use of app event and device data

- a. **To understand app and service usage:** We do the following with your information:
 - i. We remove any identifiers from your information before using it to check how well our app works and to make sure your information is safe.
 - ii. We check and record the safety and performance of the app so we can report to your Institution or meet our legal requirements.
 - iii. We share data that cannot identify you about your usage of the app with trusted analytics providers. This helps us make the app and their services better.
 - iv. We use the Information to create new services, technologies, and products.

Legal basis: contract performance, legitimate interests, legal obligation. Use of appropriate additional conditions for any special category personal data.

- b. **For marketing purposes:** We do the following with your information:
 - i. Sometimes, we create and run campaigns, send out surveys, and give updates about our programs.
 - ii. We also use anonymous data to understand how well we are doing, make marketing materials, and benchmark ourselves with others.

Legal basis: For each purpose listed above we will rely on one among the following, legitimate interests, consent.

- c. **To ensure availability and security:** We do the following with your information:
 - i. To make sure the content on our app works well.
 - ii. To keep your information safe from hackers and online threats.

Legal basis: For each purpose listed above we will rely on one among the following, contract performance, legitimate interests.

- d. **For fraud prevention:** To prevent fraud or misuse of our services and to secure our systems.

Legal basis: legitimate interests.

8. Use of Cookie Information

We need to use some necessary cookies to make sure our apps work properly. Here is a simple guide to the kinds of cookies we might use:

- Essential cookies. These are very important and are needed for the apps to work. They help make sure everything runs smoothly, like when you chat on the app. These cookies do not collect any information about you. We handle these cookies ourselves.
- Analytical cookies. We also use these cookies to see how well our apps are doing. They help us understand what is working and what needs fixing. Sometimes, we use our own cookies for this, and sometimes we use Google Analytics. If you want to know what Google Analytics does with the information, you can visit their website. <https://www.google.com/policies/privacy/partners/>. You can opt out from Google's cookies by downloading the [Google Analytics Opt-out Browser Add-on Download Page](#). We do not use special Google tools to show you ads or test features on the EMH App, DRA and Co-pilot. We do not use Google signals, which means we do not collect information about you or what you like.

"Do Not Track" (DNT) is something you can turn on in your web browser to keep your online activities more private. However, even if you turn DNT on, we do not collect those signals today.

Legal basis: legitimate interests.

Additional processing when you use the DRA Service

- 1. **For processing your eligibility and clinical assessment data**
 - a. **To process your provided data:** We do the following with your information:
 - i. We gather, move and store the information you submit.

- ii. We delete your personal data when we no longer need it, as agreed with your Institution.
- iii. The app provides you with safety resources and guides you on how to use them.

Legal basis: as defined by your Institution for public health, legitimate interests. Use of appropriate additional conditions for any special category personal data specified by your Institution.

- b. **To transfer data to your institution:** We do the following with your information;
 - i. We connect securely with your institution's clinical management system.
 - ii. We receive your personal information for sharing with the institution-authorized service providers for care purposes.
 - iii. We share your eligibility and clinical assessment Information with your Institution.
 - iv. We retain and delete your information as agreed with your Institution.

Legal basis: as defined by your Institution for public health, legitimate interests. Use of appropriate additional conditions for any special category personal data specified by your Institution.

- c. **To transfer data to your Institution authorized service providers:** We do the following with your information:
 - i. Provide you access to your institution-provided therapy or care services.
 - ii. We connect securely with the service provider's clinical management system.
 - iii. We transfer your Institution provided data along with data provided by you with the service providers for care purposes.
 - iv. We share your clinical assessment information with the service providers.
 - v. We retain and delete your information as agreed with your Institution.

Legal basis: as defined by your Institution for public health, legitimate interests. Use of appropriate additional conditions for any special category personal data specified by your Institution.

Additional processing when you use the Therapist Companion service

- a. **For processing your data related to communications with your Institution clinicians**

To process your provided Data. We do the following

- o Provide access to use the resources provided by your assigned clinician or well-being advisors.
- o Allow your Institution assigned clinicians to review your To-Do, activity, exercise progress and support you.

- Where provided access, to allow Clinicians or well-being advisors to review your conversation data.
- Assist you with appropriate support resources and guidance.

Legal basis: For each purpose listed above we will rely on one among the following, contract performance and legitimate interests.

Additional processing for Children and Young People(CYP) users.

1. For processing your onward support request

- a. **To process your provided data:** We do the following with your information when you choose to seek additional support:
 - i. We gather, move and store the information you submit.
 - ii. We share your request with your Institution.
 - iii. We delete your personal data when we no longer need it, as agreed with your Institution.
 - iv. Where required, We help you find safety resources and guide you on how to use them.

Legal basis: as defined by your Institution.

- b. **To transfer your request to authorized parties:** We do the following with your information:
 - i. We send your request to your Institution or care provider.
 - ii. If you ask us to, we can also send you a copy of your request.
 - iii. If you ask us to, we can send a copy of your request to your parent or guardian, too.

Legal basis: consent and as defined by your Institution.

Additional processing when you use the LLM-enabled AI

1. Use of Conversation data

- a. **To provide the LLM-enabled AI:** We do the following with your information:
 - i. We share your relevant conversation messages with the LLM (“Input”).
 - ii. We use LLM to process and classify conversation data for risks to ensure safer and improved conversational flows.
 - iii. We design prompts to guide the LLM to respond appropriately to the Input. The prompts include your message, summaries of your chats over a period and our validated instructions.
 - iv. The AI detects personal identifiers that you might have shared by mistake. If there are any, the AI will ask you to change your conversation message before sending it to the LLM.
 - v. We have safety rules to keep your chats with the LLM safe. All Inputs go through these safety rules. If your message does not clear the safety rules we do not send it to the LLM. When the LLM responds (“Output”), it also

has to pass the safety rules. If it does not, we do not release the Output, instead providing a pre-defined safe response.

Legal basis: For each purpose listed above we will rely on one among the following, contract performance, legitimate interests.

2. We do not share or sell your information, messages, or how you use our apps to advertisers or companies that buy data.

Additional Processing: When you join our testing or research initiatives

- a. **To process the information shared by you during participation.** We do the following
 - i. Provide a participant information sheet.
 - ii. Inform about the testing or study purposes.
 - iii. Understand your eligibility and shortlist for the study.
 - iv. Manage your joining process.
 - v. Send testing or study-related information and reminders.
 - vi. Seek your feedback and clarify any questions.
 - vii. Use your personal details to make sure everyone has a fair chance to join in and that we test our product with the right groups of people.
 - viii. Generate identifiers to associate and maintain the integrity of your data across apps you use.

Legal basis: For each purpose listed above we will rely on one among the following, your consent and legitimate interests.

- b. **To improve our app features, experience and performance:** We do the following with your information:
 - i. Invite you to join activities like sharing your thoughts about our product, or helping us test it.
 - ii. Understand your feedback so we can make our product and services safer and better.
 - iii. Understand and gather evidence as to whether our products are helpful in improving your mental health and wellbeing.
 - iv. Establish the effectiveness and impact of Haruki programs.
 - v. Where made available, to share supportive resources with you.
 - vi. Share your study-related data and inputs with your Institution's research team.

Legal basis: For each purpose listed above we will rely on one among the following, your consent, public interest, legitimate interests. Collaborated research studies with your Institutions may be in Public Interest.

Note: You can stop participating in the testing or research at any time after it starts.

Processing for Legitimate Interests

We may need to use your personal information for important reasons. Before doing this, we will always protect your rights and privacy. Here are the reasons we might use your data:

1. To follow our agreements with your Institution.
2. If the law requires us to use or share it.
3. For court cases or legal orders.
4. For law enforcement or national security needs.
5. To help investigate or stop illegal activities.
6. To freeze data for legal reasons so that it cannot be changed or deleted.
7. To report public health information.
8. To prevent serious risks to health or safety.
9. To do basic research and understand how people use our services.
10. To communicate with you about using our app and services.
11. To fix and protect the app's security and operations.
12. To stop fraud or misuse of our service.
13. To keep your data secure and private.
14. To make sure the app and services work well and are easy to use.
15. To protect your fundamental rights, and safety.
16. To use anonymous data for benchmarking and marketing.
17. To create new services, technologies, and products.
18. To answer your questions and requests.

4. How We Protect Your Information

Where is your information stored

The information we collect is saved and kept safe in our cloud servers managed by Amazon Web Services (AWS). Some of your information might be shared and stored with our third-party service providers to provide our services. For a list of service providers please read [here](#).

How long do we keep your information

When you use our EMH App and Services including Institutional Services

When you send us text messages, any personal identifier you share is reasonably removed and saved in a way that cannot be undone. We keep this information only for as long as we need to follow the law or our Institutional contracts. If there is no specific time limit mentioned, we keep your information for up to 10 years from the last time you updated it. After that, we delete your data from our system. Where required by law, we may retain one copy of your data. You can also choose to delete all your conversation data forever by using the 'reset my data' option in the App settings.

Your correspondence data

When you email us, we use the information you give to help you. We keep your emails safe in our Google Workspace account, and only certain staff can look at them. We will keep your email

for up to 10 years from the last time you contacted us. We may archive your messages longer where required by the law.

When you use our DRA or CYP referral service(for CYP users)

We keep your information for the time your Institution has decided. After the agreed time, we delete your information forever from our systems. Once you submit the form and your information, we cannot change it. If you need to add or edit your personal data you will need to reach out to your Institution.

When you use LLM-enabled AI

We keep your personal and derived information in our and third-party service provider systems only for as long as needed to meet the purposes stated in our privacy policy or as required by law. We have enabled Zero data retention with the LLM provider and hence your conversation data does not get stored with them. We have enabled all data processing by the LLM provider in their Europe data region.

When you join our testing or research initiatives

You can stop participating in the testing or research at any time after it starts. You can do this by using any of the suggested opt-out features or by sending an email to support@HarukiHealth.com with the subject "opt out of Haruki testing/study". Once you opt out, we will delete your study data within one year. However, the data you provided during the research study or testing will be kept according to our data retention policy. We will keep this information only for as long as we need. If there is no specific time limit mentioned, we keep your information for up to 10 years from the last time you updated it. After that, we will delete your data from our system. Where required, we may retain one copy of your anonymized data for a longer duration for any future audit or verification purposes.

Data Security

We use physical, organizational, and technical safeguards to keep your information safe. Here are some ways we do that:

Protecting your privacy

1. You do not need to register to use the app.
2. Just give us a nickname so our chatbot knows what to call you.
3. We use pseudonymised identifiers to keep your data and identity safe.
4. No real people can listen to what you are talking about with the Conversation Space.
5. If you accidentally share personal data, we will make sure to remove it so no one can see it.
6. As a EMH App user, you can choose "reset my data" to delete your conversation data.
7. Before we use any personal data about you, we make sure it respects your rights.

Protecting your security

1. We use strong encryption to protect your data when it is being sent or stored.
2. We use secure application interfaces and secure data transfer protocols.
3. Only certain people can access your data. They have to use strong passwords and an additional access code.
4. All our staff computers have extra security.
5. We maintain contracts with companies we work with to keep your data safe.
6. We carefully check the background of new staff before hiring them.
7. We train our staff on how to handle your information securely.
8. We have experts from outside our company check if we are following the rules every year.
9. We regularly test our app and systems for any weaknesses.
10. We fix any problems in our computer code to make sure it is safe.
11. We often check to make sure we are following our safety plans and rules.

Additional safeguards when you use LLM-enabled AI

1. Every message sent to and from the LLM is encrypted so no one else can read it.
2. Any personal identifiers voluntarily shared in conversation data gets removed. This helps keep your private details safe from being shared with the LLM service provider.
3. We use safety rules to always check what is sent and received from the LLM to make sure it is safe and good to use.
4. We do not share your device data with the LLM.
5. Your conversation messages are never stored at the LLM.
6. Your conversation messages are not used as training data by the LLM.

Responsible use of Artificial Intelligence

At Haruki, we use artificial intelligence (AI) programs to understand what you type to us. These AI programs help us talk with you in a way that makes sense and guides you to helpful information. We make sure our AI chatbot is fair, safe, and treats your information with care. We use third-party Large Language Models (“LLM”) and our own AI to chat with you. Our AI is a purpose-built AI and does not operate as a general-purpose generative AI. Our AI does not change in real time (i.e. it does not continually modify itself or learn every time on its own). Each conversation with the AI works at a conversational node level within a decision-tree structure. At each node we may use either the prediction from our AI programs or the inferences from LLMs, or both. We may also use our proprietary programs to qualify a conversation sentence for an LLM inference. We have safety measures in place to keep our conversations secure and trustworthy. All recommendations from Haruki come from our own care library which is a closed source and written by our clinicians. Every piece of content generated by the AI passes through our safety and quality checks, and all LLM based conversational prompts are designed and tested by clinicians to ensure that they are clinically safe and appropriate. We also have good practices to monitor and check the use of AI at Haruki, making sure your rights are protected. Please contact us at support@HarukiHealth.com if you have any more questions about our use of AI.

While Haruki has put in place reasonable clinical safety and data protection controls, you understand and acknowledge that AI is a developing technology. The potential risks inherent to this technology may not be fully understood and fulsome safeguards may not be fully developed. Due to the nature of the technology, you may sometimes get incorrect responses that do not accurately reflect the action required.

We do our best to keep your personal data safe, but no method is perfect. We cannot promise complete security. You can help keep your data safe too. Please do not share personal identifiers where not asked. Please do not copy and share your chats with people you do not know.

Third-Party Sites

The App might have links to other websites or resources. When you click on these links, remember that these other sites have their own rules about privacy. We do not control these other sites and we are not responsible for their privacy rules. It is a good idea to read their privacy rules before you share any personal data on those sites.

Children's Privacy

The apps are meant to be used only by people allowed by your Institution. If you are too young according to your Institution rules, you should not use this App. If you are a child, please also ask your parent or guardian to read and agree to this privacy policy and the [terms of service](#). You will require your parent or guardian to send their consent to your Institution to use our service. Haruki is not responsible if someone lies about their age to use the apps. If you find out that a child has shared personal data with us when they should not have, tell us by sending an email. We encourage parents and guardians to watch over their children's internet use. Tell your children not to give out personal information without your permission.

Best Practices

We want to help you stay safe online. The NCSC Gov.UK website has tips on how to make your devices more secure. The UK ICO site gives easy advice on protecting your personal data when you are online and using computers or other gadgets. You can check out the links below to learn more.

[Cyber Aware - NCSC.GOV.UK](#)
[Online and electronic devices | ICO](#)

5. Who We Share Information With

Service Providers

We work with third-party companies that help us run our app, fix any problems, and offer other important services. These companies might use your personal data to provide services for us. For a list of service providers please read [here](#).

We also work with the Institution's authorized service providers to connect and share your information so you may get the required care from your Institution.

Legal

We sometimes need to use your personal data to follow the law. This might mean sharing your information with other people, like insurance companies, courts, police, or other important organizations around the world. This could happen if they are checking something, during court cases, or if it is required by law. We might also use your information to stop serious health or safety problems, for public health reports, and to keep information safe during legal situations so it is not changed. Also, we might share your information to help with finding out or stopping fraud or crime. We will make sure your rights and interests are protected.

Reorganization

In situations like when we might sell our business, join up with another company, reorganize, or are facing bankruptcy, we may need to share some of your personal data with others. These third-parties will use your information to look at the business deal. After these changes happen, we might also share your information with the new company for the same purposes mentioned in this privacy notice. We will try to let you know by putting a notice on our website, telling your Institution, sending you a notification in the app, or updating this privacy notice.

6. Sharing Information Outside the UK

To help us run our apps and services, we sometimes need to move your data to other countries. Some of these countries might not have strict data protection laws. When we move your personal data from places in Europe, the UK and Crown Dependencies, we make sure to take extra steps to keep it safe. When we send your personal data to places that have good protections, we do not need to take any extra steps. Sometimes, our trusted third-party service providers might need to send your data outside the UK, Crown Dependencies or Europe. We have agreements along with Standard Contractual Clauses (SCCs) with our service providers that include data protection safeguards to keep your data safe. We only share the necessary data between our Haruki offices to provide you with the best service. We use strong technology to keep your data safe.

If you have any questions about how we send your data to other countries, you can email us at support@HarukiHealth.com.

7. Your Data Protection Rights

When you trigger "Reset my data" from app settings

The "Reset my Data" feature is found in the app settings of the EMH App. If you use this feature, all your conversation information, including your ID, past chats, reminders, assessment answers, and settings will be deleted from our system. Once you reset, you cannot get back any of your old conversations and you will be treated like a new user. So, think carefully before using this feature.

Your Privacy Rights

What Can You Do About Your Data?

- **Ask Questions:** You can ask us how we are using your personal data.
- **Get a Copy:** You can ask for a copy of the information we have about you.
- **Fix It:** If any information about you is wrong or missing, you can ask us to fix it.
- **Delete It:** If we do not need your personal data anymore, you can ask us to delete it.
- **Pause It:** While we look into any questions you have, you can ask us to stop using your data.
- **Change Your Mind:** If you had said yes to something before, you can still say no later.
- **Send It Elsewhere:** You can ask us to send your personal data to someone else electronically.
- **Object:** You can tell us not to use your personal data for things we think are important.
- **No Marketing:** If you do not want to get marketing emails, just click 'unsubscribe' in the emails.
- **Be fair:** When you use our app, we will not treat you unfairly for using your rights.
- **No Sale:** You can choose to stop your personal data from being sold or shared with others who might want to sell it.
- **Automated Decisions:** Our Service uses AI to help you. We do not use AI to know your identity. We always check with you before making key suggestions. We change our conversation anytime you inform us that the AI is not helping. We and our service providers might use AI to make automated decisions or automatically process information if we need to perform our services or to stop fraud, abuse or misuse of our services. By using our Services, you agree to let us use AI for providing our service. We might change the automated approach we use in the future.

Consent Management

Obtaining Consent: Where we request your consent before collecting any personal data, clear and easily understandable explanations will be provided regarding the purpose and scope of data processing activities. You have the right to grant or deny consent.

Modification of Consent:

If you wish to modify your consent for data processing, you can do so easily by contacting our Data Protection Officer (DPO) or our customer support. Modification will not affect the lawfulness of any processing based on prior consent.

Withdrawal of Consent:

If you wish to withdraw your consent for data processing, you can do so easily by contacting our DPO or our customer support. Withdrawal will not affect the lawfulness of any processing based on prior consent.

By incorporating this consent management facility, we aim to empower you with control over your personal data, ensuring transparency and compliance with privacy regulations.

How to Exercise Your Rights

You do not usually have to pay anything to use your rights. Sometimes, we might need to check it's really you asking. Contact us using the details at the top of this privacy notice. We will reply within one month if you ask us for something.

When We Might Say “No”

We might not be able to agree to your request if:

- The processing is required to provide continuity of our services.
- The law says we cannot.
- It affects someone else's privacy.
- It could harm you, us, or someone else's rights or safety.
- If we need to retain data to ensure the reliability of our research studies.
- The request is too much or does not make sense.

8. How To Complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy policy. If you remain unhappy with how we have used your data after raising a complaint with us, you can also complain to the relevant Data Protection Authority for your country, using the links below:

[UK ICO](#)

[Jersey Office of the Information Commissioner](#)

[Office of the Data Protection Authority \(Guernsey, Alderney, Sark\)](#)

9. Data Protection Officer

If you are still not happy with how things have been sorted out, you can send an email to our grievance officer / Data Protection Officer (DPO) at support@HarukiHealth.com.

DPO Roles and Responsibilities:

- Oversee the implementation of data protection policies and procedures.
- Ensure the organization's compliance with data protection regulations.
- Conduct risk assessments related to data processing activities.
- Serve as a point of contact for data subjects / data principal and supervisory authorities.
- Monitor data security measures, investigate breaches, and enforce staff training to uphold data security.

10. Personal Data Breach Management

In the event of a personal data breach, we follow a stringent procedure to mitigate and address the incident promptly. Our response includes identifying the breach, containing its impact, assessing affected data, notifying relevant authorities, and communicating transparently with affected individuals. We conduct thorough investigations to understand the extent of the breach and implement corrective measures to prevent recurrence.

Any detected personal data breach will be reported to relevant authorities and affected individuals within 72 hours of its identification or within the time period defined in compliance with applicable data protection regulations.

11. Changes To This Policy

If we change our Privacy Policy, we will let you know in the app. If you keep using the app after we tell you about the changes, it means you are okay with them.