

## Matresa Data Privacy Notice

### About this notice

This notice explains what personal information Matresa collects when you use the Matresa app, how we use it, who we share it with, how long we keep it, and your rights.

Matresa Limited, registered office Nelson House, 2 Hamilton Terrace, Leamington Spa, Warwickshire, United Kingdom, CV32 4LY, company number 16378985 is the controller of your personal information. This means we decide how and why it is used. We are registered with the Information Commissioner's Office (ICO) under registration ZC115077.

If you have any questions about this notice or how we use your information, please contact us at [support@matresa.com](mailto:support@matresa.com).

Matresa is intended for women aged 18 and over during pregnancy and after birth.

### The information we collect

Most of the information we hold is information you give us when you use the app. Some of it is health information, which is a special category of personal data and receives extra protection under UK data protection law.

| Type of information              | Examples                                                                                                                                                                         |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Account information              | Email address, sign-in details (including Apple or Google sign-in), subscription or license status, and any referral or discount code you use                                    |
| Profile information              | Name, gender, date of birth, employment details, employer name, GP surgery name and email, return-to-work date                                                                   |
| Health and wellbeing information | Pregnancy or postnatal stage, daily check-ins (mood, symptoms, optional blood pressure), questionnaire answers including the 6–8-week check                                      |
| Your baby's information          | Your baby's date of birth and the milestones you record, and anything you tell us about your baby in your notes. We use this with your consent as your baby's parent or guardian |
| Your own notes and conversations | Diary and personal notes (including photos and voice notes), community forum posts, conversations with Florrie                                                                   |

| Type of information            | Examples                                                                                                                                      |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| Wearable and health app data   | Data from Apple Health or Google Health Connect, only if you give permission                                                                  |
| Second Ear recordings          | Recordings and transcripts of appointments you choose to record, and the To Do items created from them                                        |
| Consent and preference records | Your choices about optional features, marketing and research contact, and when you made them                                                  |
| Technical information          | IP address, device identifiers, notification tokens, login and security logs, error logs, and how you use the features and content in the app |
| Support and requests           | Messages you send us, complaints, and requests to exercise your rights                                                                        |

Your notes, forum posts and recordings may also include information about other people, such as your baby, partner or healthcare professionals. Forum posts appear under a nickname, not your real name. We do not track your location. If you unlock the app with Face ID or a fingerprint, your phone checks it and only tells us whether it passed. We never receive your biometric data.

### How we use your information and our lawful basis

UK data protection law requires us to have a lawful basis for each use of your information. For health information, we also need an additional condition. We use your health information with your explicit consent, apart from the limited cases set out in this notice where the law requires us to keep it, such as medical device safety monitoring.

| What we use it for                                                                                                   | Lawful basis                                                                                         |
|----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| Creating and running your account, providing app features, check-ins, alerts, signposting and content picked for you | Contract (providing the service you signed up for); explicit consent for health information          |
| Second Ear recording, transcription and To Do lists                                                                  | Contract; explicit consent for health information (for you); consent for the healthcare professional |
| Creating a 6–8 week check summary and link that you can email to your GP, when you choose to                         | Contract; explicit consent for health information                                                    |
| Moderating community forum posts to keep the forum safe, and keeping a record of what                                | Legitimate interests (a safe community for all users); explicit consent where removed posts          |

| What we use it for                                                                                                                | Lawful basis                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| we remove                                                                                                                         | contain health information                                                                                              |
| Developing AI models to advance maternal health (optional)                                                                        | Consent and explicit consent                                                                                            |
| Contacting you about future research (optional)                                                                                   | Consent and explicit consent                                                                                            |
| Marketing emails (optional)                                                                                                       | Consent                                                                                                                 |
| Referral codes                                                                                                                    | Consent                                                                                                                 |
| Managing your subscription (Apple and Google tell us whether it is active) and keeping financial records                          | Contract; legal obligation (financial records)                                                                          |
| Inviting you to Matresa if your employer provides it                                                                              | Legitimate interests (setting up the workplace benefit your employer provides); contract once you activate your account |
| Answering your support queries                                                                                                    | Contract; legitimate interests; explicit consent if you choose to tell us health information                            |
| Holding information about other people that users choose to put in their notes, forum posts or profile (for example, a GP's name) | Legitimate interests (letting users keep personal records and share information with their GP)                          |
| Analytics and crash reporting                                                                                                     | Consent where the law requires it for analytics; legitimate interests for crash reporting                               |
| Monitoring the safety of the app as a medical device                                                                              | Legal obligation under UK medical device regulations                                                                    |
| Keeping records of consents, requests and complaints, and responding to your requests                                             | Legal obligation and legitimate interests (showing we comply with the law)                                              |
| Security, audit and fraud prevention                                                                                              | Legitimate interests (keeping the app and your information secure)                                                      |

You can withdraw consent at any time in Settings or by contacting us. Withdrawing consent does not affect processing that took place before you withdrew. The app relies on your health information to work, so if you withdraw consent for its use, some or all features will stop working [and you may need to close your account].

Matresa uses automated rules to show you alerts and signpost you to support, based on your answers. These alerts do not make decisions about you that have legal or similarly significant effects, and they do not replace advice from a healthcare professional. We also use your stage of pregnancy or motherhood, what you read and watch, and your check-in answers to choose what

appears in the "For You" area, which refreshes weekly. This only changes what content you see. It does not decide which features you can use. Content about miscarriage, stillbirth or baby loss is left out unless you tell us about a relevant event.

## **Second Ear: recording your appointments**

Second Ear lets you record your own healthcare appointments so you can remember what was discussed. The recording is transcribed, and the app creates a To Do list of practical, non-clinical actions from the transcript.

- **Healthcare professional consent.** Before recording, the healthcare professional is asked to give consent in the app. Their consent is recorded, and they can withdraw it. If they withdraw, the recording and transcript are deleted.
- **How it is processed.** Audio is transcribed by Microsoft Azure acting on our behalf. The transcription copy is deleted from Azure as soon as transcription is complete. The transcript is then processed by an AI service (Amazon Bedrock, London region) to pick out practical follow-up tasks for your To Do list.
- **How long we keep it.** Recordings and transcripts are kept for 12 months from the date of recording, or deleted earlier if consent is withdrawn. To Do items are kept while your account is active.
- **Not used for AI development.** Second Ear recordings and transcripts are not used to develop AI models.
- **Personal use and sharing.** Recordings are for your own reference. Our Terms of Use ask you not to publish them. If you share a transcript summary through WhatsApp, it leaves Matresa and WhatsApp's own terms apply.

**Information for healthcare professionals.** If you have been recorded through Second Ear, we hold your voice, your name if spoken, and what you said during the appointment. We use it only to provide the transcript and To Do list to the patient, and keep it for no longer than 12 months. The transcript is also processed by an AI service in the UK to create the To Do list. We do not use it to develop AI models. We rely on your consent. [Subject to legal review.] You can withdraw consent or exercise your rights by contacting us at [privacy@matresa.com].

## **Florrie and AI model development**

**Florrie.** Florrie is Matresa's AI assistant. When you ask Florrie a question, it searches Matresa's approved articles, videos and audio and points you to the most relevant ones. It does not search the internet and does not send what you type to an outside AI service. Florrie also shows fixed reminders and messages based on your check-ins and questionnaires. Your conversations are kept in the app so you can look back at them, and they are not used to train AI models. Florrie provides information and support, not medical advice. It does not diagnose, score your answers or tell you how urgent something is, so please do not use it for medical questions.

**AI model development (optional).** With your separate, explicit consent, we use your pseudonymised information to develop, train, test and improve AI models that support maternal health and wellbeing during pregnancy and after birth. Our research aims include predicting health risks earlier, such as pre-eclampsia and changes in perinatal mental health.

- **Pseudonymised.** Details that directly identify you are removed and replaced with a code. The key linking the code to you is held separately with restricted access.
- **What is used.** Structured information such as check-in and questionnaire answers and logged readings. We do not use data from Apple Health or Google Health Connect unless Apple and Google's rules allow it. Second Ear recordings and transcripts are never used.
- **Your notes, forum posts and Florrie conversations.** These are held in pseudonymised form but are not used until effective anonymisation methods have been developed, because they may mention other people. Only anonymised versions would ever be used.
- **What it is never used for.** Advertising, insurance, credit or employment decisions, or any purpose unrelated to maternal health. Your information is never sold.
- **How long.** Pseudonymised data is kept for up to 10 years and then anonymised, so that it can no longer be linked to you.
- **Your choice.** You can use every feature of Matresa without agreeing. If you withdraw consent in Settings, your information is removed from the dataset within 30 days. Information already used to train a model cannot always be removed from that model, because the model keeps learned patterns rather than your records. Closing your account does not by itself remove your pseudonymised data from this dataset. To make sure it is removed, withdraw your AI model development consent in Settings before you close your account. If you have already closed your account, contact us and we will try to find and remove your data, but once your account has been deleted we may not always be able to.

## Community forum

Forum posts appear under a nickname, not your real name. An automated moderation service (Amazon Bedrock Guardrails, London region) checks posts against our rules to spot unsafe or inappropriate content and unnecessary personal information. The service only checks posts against our rules, and posts are not used to train any AI model. Anything it flags is held for review by authorised Matresa staff, and other users can report posts too. If a post is removed, we keep it for 6 months, and a record of the decision for 24 months, so that we can deal with complaints and show we acted properly. Posts can include health information, so please think before sharing details about yourself, your baby or anyone else.

## Contact about future research (optional)

If you agree, we may contact you about future ethically approved research studies in maternal health and wellbeing for which you may be suitable. These are studies with a favourable opinion from a Research Ethics Committee, and HRA Approval where required.

We use information such as your stage of pregnancy or time since birth to contact you only about relevant studies. Agreeing to be contacted does not mean you agree to take part. We do not share your details with researchers unless you agree as part of a specific study's own consent process. You can change your mind at any time in Settings, and we will re-confirm your choice every 2 years.

## If your employer provides Matresa

If your employer has given you access to Matresa, your employer gives us your name and work email address so we can invite you. If you do not activate your account within 90 days, we delete

these details. Your employer decides who it offers Matresa to, and is separately responsible for the information it holds about you.

Your employer can see [only whether your licence has been assigned and activated]. Your employer never sees your health information, notes, recordings or any other information you enter into the app. [Confirm the exact scope of employer visibility with the technical team.]

## Medical device safety monitoring

Matresa is registered with the Medicines and Healthcare products Regulatory Agency (MHRA) as a Class I medical device. The law requires us to monitor its safety after it is in use, and to investigate if something goes wrong.

To do this, we keep some information for longer than the rest of your account:

- **Contact details.** Your profile information is kept for 10 years after your account closes, so we can contact you if a safety issue affecting you comes to light.
- **Alert records.** If your answers triggered an alert in the app, we keep those answers and a record of the alert for 365 days after your account closes.
- **Safety incidents.** If you or anyone else reports a safety concern or incident, we keep the relevant information for the longer of the device's monitoring period or 10 years.

## If you are not a Matresa user

We may hold some information about people who do not use the app:

- **Healthcare professionals recorded in Second Ear.** See the Second Ear section above.
- **GPs and midwives named on a user's profile.** If a user adds her GP surgery's name and email address so she can email her 6–8 week check, we hold those details only for that purpose. We do not contact the GP ourselves.
- **People mentioned in notes, forum posts or Florrie chats.** Users may mention a partner, relative or friend. We do not ask for this information, and our Terms of Use and forum guidelines ask users not to include details about people who have not agreed. We hold it because it is part of what the user has chosen to write.
- **Employees invited by an employer.** See "If your employer provides Matresa" above.

You have the same rights as our users, set out below. Because notes and posts are free text, we may need you to give us enough detail to help us find what we hold.

## Who we share your information with and where it is stored

We never sell your information. We share it only with organisations that help us run Matresa, under contracts that require them to keep it secure and use it only on our instructions, or where you ask us to.

| Organisation        | What for                                                 | Where       |
|---------------------|----------------------------------------------------------|-------------|
| Amazon Web Services | Hosting, storage, backups, Florrie, forum moderation and | UK (London) |

| Organisation                          | What for                                                                                                                                                                                                                                                                                                                   | Where                                      |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
|                                       | Second Ear To Do lists                                                                                                                                                                                                                                                                                                     |                                            |
| Microsoft Azure                       | Second Ear transcription                                                                                                                                                                                                                                                                                                   | UK                                         |
| Blueberry Consultants                 | App development, maintenance and support                                                                                                                                                                                                                                                                                   | UK                                         |
| Apple and Google                      | Sign-in, payments and subscriptions, and push notifications. Apple Health and Google Health Connect store the data you choose to connect on your phone, and we read it from there with your permission. Apple and Google are separate controllers of the information they collect themselves, such as your payment details | Under their own terms and privacy policies |
| Beehiiv                               | Marketing emails, if you opt in (we share only your name and email address)                                                                                                                                                                                                                                                | US                                         |
| Vimeo                                 | Hosting videos shown in the app                                                                                                                                                                                                                                                                                            | US                                         |
| Analytics or crash reporting provider | Blueberry                                                                                                                                                                                                                                                                                                                  | UK                                         |

**Sharing you choose.** If you send your 6–8 week check summary to your GP, or share content from the app through WhatsApp or other apps, you decide what is shared and with whom. Once shared, the recipient is responsible for it. When you choose to email your 6–8 week check to your GP, we create a file and a link, and your email app opens with a message ready for you to send from your own account. We do not send it to your GP ourselves, and the link stops working after 7 days.

**Other disclosures.** We may disclose information where the law requires it, for example to the MHRA for medical device safety reporting, or where there is a serious risk of harm to you or someone else.

**International transfers.** Most of your information stays in the UK. Where a provider processes information outside the UK, we make sure it is protected by UK-approved safeguards, such as the UK–US Data Bridge or the UK International Data Transfer Agreement.

### How long we keep your information

We keep your information only for as long as we need it. The main periods are below.

| Information                                                                                             | How long we keep it                                                                                                                                                                                                      |
|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Account information                                                                                     | While your account is active; deleted when it closes                                                                                                                                                                     |
| Health and wellbeing information, notes, forum posts, Florrie conversations, wearable data, To Do items | While your account is active, plus 30 days                                                                                                                                                                               |
| Profile information                                                                                     | 10 years after your account closes (medical device safety)                                                                                                                                                               |
| Alert records                                                                                           | 365 days after your account closes                                                                                                                                                                                       |
| Second Ear recordings and transcripts                                                                   | 12 months from recording, or earlier if consent is withdrawn                                                                                                                                                             |
| 6–8 week check summary file                                                                             | Link expires within 7 days; file deleted after 30 days                                                                                                                                                                   |
| Files we create when you ask for a copy of your information                                             | Link expires within 7 days; file deleted after 30 days                                                                                                                                                                   |
| Pseudonymised AI development data                                                                       | Up to 10 years, then anonymised; removed within 30 days if you withdraw consent                                                                                                                                          |
| Marketing contact details                                                                               | While you are opted in (we review this at least every 2 years); removed within 30 days of opting out, keeping only a minimal record (such as a scrambled form of your email address) so that we do not contact you again |
| Referral codes                                                                                          | Unused codes: 12 months. Used codes: 24 months after use, then deleted or anonymised                                                                                                                                     |
| Research contact choice                                                                                 | While your consent is active                                                                                                                                                                                             |
| Consent records                                                                                         | For as long as we rely on the consent, plus 6 years                                                                                                                                                                      |
| Requests and complaints                                                                                 | 3 years after closure                                                                                                                                                                                                    |
| Support messages                                                                                        | 2 years after your query is resolved                                                                                                                                                                                     |
| Security and audit logs                                                                                 | 12 months                                                                                                                                                                                                                |
| Removed forum posts and moderation records                                                              | Removed posts: 6 months. Records of moderation decisions: 24 months                                                                                                                                                      |
| Employer invitations that are never activated                                                           | 90 days from the invitation                                                                                                                                                                                              |

| Information                      | How long we keep it                          |
|----------------------------------|----------------------------------------------|
| Analytics and crash reports      | Analytics: 14 months. Crash reports: 90 days |
| Subscription transaction records | 6 years                                      |

If you do not use your account for 3 years, we treat it as closed. Deleted information may remain in encrypted backups for up to 35 days until they expire. Information that has been fully anonymised is no longer personal information and may be kept.

## How we protect your information

Your information is encrypted when stored and when sent between your device and our systems. Access is limited to people who need it for their role, and access is logged. Staff who use our admin system must sign in with multi-factor authentication. We carry out regular security testing, keep encrypted backups, and train staff who handle personal information. Wherever practical, we use a code instead of your name inside our systems, and the key linking the code to you is held separately. [Matresa completes the NHS Data Security and Protection Toolkit.]

## Your rights and choices

You have the following rights over your personal information:

- **Access.** Ask for a copy of the information we hold about you.
- **Correction.** Ask us to correct information that is wrong or incomplete.
- **Deletion.** Ask us to delete your information. We may need to keep some information where the law requires it, for example for medical device safety. Deleting your account does not automatically remove pseudonymised data held for AI model development. See "Florrie and AI model development" above.
- **Restriction.** Ask us to limit how we use your information in certain circumstances. This may mean some features stop working.
- **Portability.** Ask for the information you have given us in a structured, commonly used and machine-readable format [format and scope to confirm following legal review].
- **Objection.** Object to our use of your information where we rely on legitimate interests.
- **Withdraw consent.** Change your choices at any time in Settings, including for health information, AI model development, research contact and marketing.

To exercise any of these rights, contact us at [privacy@matresa.com]. We will respond within one month. There is normally no charge. You can use these rights for your baby too, as their parent or guardian.

## Complaints and changes to this notice

If you are unhappy with how we have used your information, please contact us first at support@matresa.com so we can try to put it right. You also have the right to complain to the Information Commissioner's Office at [ico.org.uk](https://ico.org.uk) or on 0303 123 1113.

We will update this notice when we change how we use your information. We will tell you in the app about any important changes, and ask for your consent again where the law requires it.