HIGHBRIDGE

PRIVACY POLICY

MMW APS

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Last updated: July 14th 2025

1. GENERAL

1.1 This Privacy Policy applies to all collected and processed personal data that you have provided to us, or we have collected as part of delivering our services/products. "**Personal Data**" means any information relating to an identified or identifiable natural person.

2. IDENTITY OF THE DATA CONTROLLER

2.1 If there are any questions regarding this Privacy Policy, you may contact us using the information below.

MMW ApS (My Mental Wellbeing)
Reg. no.: 44836734
Roskildevej 149, 2500, Copenhagen
Denmark

Attn: Daniel Ekara
Daniel.ekara.dev@gmail.com
+2348120944640

2.2 We are processing your personal data in accordance with the General Data Protection Regulation (GDPR) and any national regulation applicable to us.

3. PURPOSE OF PROCESSING

3.1 Non-sensitive personal data

We collect the following non-sensitive personal data about you when you sign up as a customer/user:

- NAME
- ADDRESS
- E-MAIL
- TEAM OVERVIEW
- COUNTRY
- TITLE
- GENDER
- DEPARTMENT
- DATE OF BIRTH
- EMPLOYEE STARTING DATE

3.1.1 We process non-sensitive personal data on the basis of Article 6 in the GDPR, more specifically, our legal basis for collecting and processing personal data is for each service outlined below:

The processing of your data is either based on:

- Consent – processing is based on consent obtained from you.
- Contract – processing is necessary to fulfil a contractual obligation with you or to enter into such an obligation.
- Legal obligation – it is required by law that we process the personal data.
- Legitimate interest – processing occurs to pursue our legitimate interest.

3.1.2 If the processing is based on your consent, you may at any time withdraw your consent by contacting us.

4. TRANSFER OF PERSONAL DATA

4.1 We **do transfer** your personal data to countries **outside the EU/EEA**, including the United States, where some of our service providers are located.

4.2 These transfers are made only to organizations that provide appropriate safeguards for your data, such as:

4.3 Countries that the European Commission has determined provide an adequate level of data protection.

4.4 Service providers who have entered into the **EU Standard Contractual Clauses (SCCs)** or equivalent safeguards approved by the European Commission.

4.5 Denmark ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

4.6 We will not share your personal data with any third party without your consent, unless it is specifically stated or required by law that we do so.

5. PROFILING AND AUTOMATED DECISION MAKING

5.1 Our processing activities do not include profiling or automated decision-making.

6. BUSINESS TRANSFERS

6.1 In the event of an actual or contemplated transfer of our company or our assets, or if we discontinue our business or enter into bankruptcy proceedings, we will include data, including your personal information, among the assets transferred to any parties who acquire us or such assets may be the subject of review (due diligence) by such parties (or their representatives). You acknowledge that such transfers may occur, and that any parties who acquire, or contemplate to acquire us may, to the extent permitted by applicable law, continue to use your personal information according to this policy, which

they will be required to assume as it is the basis for any ownership or use rights we have over such information.

7. USE OF PERSONAL DATA

7.1 We only process your personal data as stated in this privacy policy and we do not use your personal data for any other purpose than explicitly described above or communicated directly to you elsewhere.

7.2 We process your personal data in a lawful, fair and transparent manner. The data we collect is solely used for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

7.3 All use of your personal data is relevant and limited to what is necessary in relation to the purposes for which they are processed.

8. SECURITY

8.1 When we store and process personal data that we have received from you, we always take every step possible to store it in a secure manner. However, we cannot guarantee that your data is 100% secure as we cannot guarantee that the data will not be accessed or otherwise misused as a result of an unlawful act or similar. We do take all necessary precautions to keep your data safe. When you give us access to - or transfer personal data to us - you do so at your own risk.

8.2 The following security measures are in place to keep your data safe:

8.3 Encryption

- Anonymization
- Firewalls & anti-virus
- Internal policies & password protection

8.4 To further increase the level of security, we have “deletion policies” in place. Personal data is kept for a maximum period of [6] months from when the purpose of the processing has ended.

8.5 However, for specific features such as displaying historical data to users, our processing period spans up to two (2) years from the time the data is collected. During this period, we retain personal data strictly for the purpose of providing accurate historical context and insights to users.

8.6 After this processing period concludes, the data is either securely deleted or anonymized in accordance with our retention and deletion policies.

9. ACCESS TO YOUR INFORMATION

9.1 Right to access

GDPR Article 15: You have the right to obtain a confirmation from us as to whether or not personal data concerning you are being processed, including information on the purpose-, categories-, recipients-, and time of storage of the processing.

9.2 Right to rectification
GDPR Article 16: If you figure out that the data that is being processed about you is inaccurate or incomplete, you have the right to get that data rectified. We will communicate any rectification or erasure of personal data to any recipient to whom the personal data has been originally disclosed, unless it proves impossible according to Article 19.

9.3 Right to erasure and restriction of processing
GDPR Article 17: You also have the right to get your personal data erased, if the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed. Please see Article 17 for the full list of reasons for your right to erasure.

9.4 Right to restriction of processing
GDPR Article 18: You have the right to restrict the processing of your personal data if it is (i) inaccurate; (ii) unlawful; (iii) the purpose of the processing has changed; or (iv) you have objected to the processing according to Article 21.

9.5 Right to data portability
GDPR Article 20: You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format. You can also request that we transmit your data to another party.

9.6 Right to object
GDPR Article 21: You have the right to object to the processing of your personal data if it is being used for profiling or direct marketing purposes.

10. SUB-PROCESSORS

10.1 We use data processors to be able to deliver our services and run our business. We have listed the various categories of handling, its purposes and the supplier in the below table:

Category	**Purpose**	**Sub-processors (or a similar and identifiable service)**
Web Hosting	Hosting and serving the application	Hostinger VPS (https://www.hostinger.com)
Object Storage	Storage of uploaded files and static assets	Google Cloud Storage (https://cloud.google.com/storage)

Artificial Intelligence	Natural language processing and AI-generated responses	OpenAI (https://openai.com)
Email Delivery	Sending transactional and notification emails	Resend (https://resend.com)

11. CONTACT INFORMATION, REQUESTS & COMPLAINTS

11.1 If you want to exercise any of your above rights, please contact our Data Protection Responsible/ Data Protection Officer:

MMW ApS (My Mental Wellbeing)
Reg. no.: 44836734
Roskildevej 149, 2500, Copenhagen
Denmark

Attn: Subhi Irshed
Subhi@mmwai.io

11.2 If you find that your personal data has been processed in a way that does not meet the requirements of the GDPR and if you want to file a complaint, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will guide you through the process. See contact information below:

Datatilsynet
Carl Jacobsens Vej 35
2500 Valby
Denmark

dt@datatilsynet.dk
+45 33 19 32 00