Privacy Policy

Subtle Health Limited (Neare) | Last reviewed:, 27 October 2026

Introduction

This Privacy and Cookies Statement explains how personal information is collected, used, and disclosed by Subtle Health Limited, a UK company registered in England and Wales (company number 17470981), whose registered office is at Founders Factory, Level 7 Arundel Street Building, 180 Strand, London, WC2R 3DA ("we", "us", "our") in connection with your use of Neare, our home sensors, app, website and related services (collectively the "Services"). We are registered with the UK Information Commissioner's Office (ICO), registration number ZC259954. This statement applies to users in the United Kingdom and the United States.

We respect your right to privacy, and the right of the person living in a home where Neare is installed to decide how information about their daily routine is used. This Privacy and Cookies Statement together with any terms and conditions of use for the Services ("Terms") and any other documents which they refer to sets out the basis on which any personal data we collect from you, and from the person in the home, will be processed by us.

Neare uses off-the-shelf home sensors (such as motion, door-contact and bed-pressure sensors) to learn a person's usual routine and share simple summaries with family members they have chosen. Neare does not use cameras, microphones or wearables. **Neare is not a medical device or an emergency service**, and nobody watches the data in real time.

Our Services apply a "data protection by default" and "data protection by design" approach in keeping with the principle of minimising the processing of personal data to the extent necessary to provide the Services and to further develop and enhance our Services. Accordingly, Subtle Health Limited will not take any steps to re-identify or de-anonymise any de-identified sensor data or otherwise associate it with personally identifiable information, and does not authorise, instruct, or encourage any third party to do so.

The purpose of this privacy notice is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please contact us or discontinue use of our Services.

Consent

Information from Neare sensors can reveal things about a person's health and wellbeing, so we treat it as health data. We rely on the explicit consent of the person living in the home as the legal basis for processing it. If that person cannot make the decision themselves, we only proceed with someone who has legal authority to decide for them (in England and Wales, a health and welfare Lasting Power of Attorney or a court-appointed deputy; in the US, a legal representative such as an agent under a power of attorney or a health care proxy). Consent from the family member who sets up Neare is not enough on its own.

We have our own clear consent mechanisms in place, and you can withdraw your consent at any time as outlined below. If you also agree, we process de-identified sensor data for the purpose of improving the Services. This is optional and separate, and saying no does not affect the

Services. Your rights and the mechanisms for withdrawing from this type of processing are clearly outlined below.

Acceptance of this privacy and cookies statement

We will ask you to read this Privacy and Cookies Statement before you start using the Services. If you do not agree with or you are not comfortable with any aspect of it, you should not use the Services. Using the Services does not replace the separate consent described above.

You may also request deletion of previously collected user data by contacting us at the contact details below. We may update our privacy policy from time to time. If we make a material change to the policy, we will notify you before making that change to allow you to opt out if you no longer agree to our collection and use of information practices, and where the change affects something you consented to, we will ask for your consent again.

Information we may collect from you

- Names, email addresses and phone numbers of the family member who sets up Neare, the person in the home, and any welfare contact they choose, if we need to contact you in respect of the Services or this Privacy and Cookies Statement;
- The home address and basic household details needed to install and support the sensors;
- Time-stamped sensor events, such as motion in a room, a door opening, or getting into or out of bed, and the routine summaries we create from them (“Sensor Data”);
- Technical information regarding the type and model of the sensors and devices being used for the Services, which helps us to understand how the Services work on different devices;
- Details of your use of the Services including, but not limited to, IP address (from which we derive location at country and region level), traffic data, and other communication data and the resources that you access;
- We may also automatically collect certain logistical information in server logs, including information about how various features of our Services are used and information about the number, frequency and length of each session;
- If you make purchases, payment is handled by our payment provider. We do not collect or store your card number or security code;
- If you take part in a pilot, your feedback, survey answers and interview notes;
- If you contact us for any reason, we may keep a record of that correspondence.

Our commitment to the privacy of the people in Neare homes

We respect that Neare is installed in someone’s home. Accordingly, we limit our collection of personal information about the person in the home to no more than is reasonably necessary to provide the Services and to improve them going forward. We do not collect any personal information about them other than as set out in this privacy policy. At any time, the person in the home (or someone with legal authority for them) can contact us, ask us to remove the sensors, and request the deletion of any personal information we store.

We collect Sensor Data when sensors detect activity in the home. Sensors record movement, not identity, so the activity of visitors or carers may also be picked up. We give the person in the

home a short notice to share with them. We may use, store and process Sensor Data in order to provide and maintain the Services and, with consent, to test or improve our own software and algorithms, or for other research and development and data analysis purposes. Additionally, Sensor Data may be reviewed by members of our team for the specific purpose of checking the Services work correctly or labelling data. We do not sell Sensor Data or use it for advertising, and we do not share it with any third parties for any purpose other than those described in this policy.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom, including the United States. Data from US users may be processed in the UK. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy and Cookies Statement, typically through the UK Extension to the EU–US Data Privacy Framework (the "UK–US data bridge") where our vendors are certified, or the ICO's International Data Transfer Agreement or Addendum. All information you provide to us is stored on secure servers, with encryption and access limited to named team members. Where we have given you (or where you have chosen) a password or username which enables you to access certain parts of our Services, you are responsible for keeping this password or username confidential.

We ask you not to share this information with anyone. You can request deletion of this data at any time by emailing us at privacy@getneare.com from the email address provided upon initial registration.

When you stop using Neare, we will delete personally identifiable information 12 months after our contact with you has terminated. Where you have agreed, we will retain de-identified data for product development purposes unless you have chosen to withdraw your consent or delete your data as outlined below. We may keep consent records and correspondence for up to 6 years to show what was agreed and to deal with any claims.

Uses made of your information

We use information held about you:

- To provide the Services: running the sensors, learning routines and sharing summaries with the family members and contacts the person in the home has chosen.
- With consent, to build better products and algorithms.
- To ensure that content from our Services is presented in the most effective manner for you and for your device.
- To notify you about important changes to our Services and our Terms and policies.
- To provide, maintain, support and improve the Services and to carry out our obligations arising from any contracts entered into between you and us.
- To provide you with information or services that you request from us or which we feel may interest you (in the case of marketing communications, we will only send these with your consent, and you can opt out at any time by following the unsubscribe option in our emails).
- To allow you to participate in interactive features of our Services.

- If you are an existing customer, we will only contact you by electronic means (such as email) with information about goods and services similar to those which were the subject of a previous transaction between us.

Disclosure of your information

We share information with the family members and contacts the person in the home has chosen, and with service providers who process data for us under written contracts and only on our instructions (such as cloud hosting, our sensor platform and email tools).

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements; or to protect the rights, property, or safety of Subtle Health Limited, its subsidiaries and its group companies, our users, or others, including where we reasonably believe someone is at serious risk of harm.

We may disclose aggregated or anonymised data if:

- We work with advisors, insurers or service providers;
- We or substantially all of our assets are acquired by a third party, in which case personal data held by us about our users will be one of the transferred assets. In the case of sale or merger the privacy policy will apply. In the case of a material change you will be notified and provided an opportunity to opt out.

Other than as set out in this Privacy and Cookies Statement, we do not currently disclose data to any other third parties; if this changes in the future we will notify users through changes in this Privacy Policy.

Cookies and similar technology

If you are accessing our Services directly, we may collect information about your computer or other device including, where available, device and browser type for system administration and analytical purposes. This is statistical data about how you use our Services.

For the same reason, we may obtain information about your general usage of the Services by using a cookie or similar software which is stored on the memory of your computer or device. Cookies help us to improve our Services and to deliver a better and more personalised service. We only use strictly necessary cookies by default, and we only use analytics cookies if you agree. We do not use advertising cookies, and we do not use web beacons or tracking pixels on pages or app screens that show Sensor Data.

You may refuse to accept cookies by activating the settings on your browser or device which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Services.

Your data subject rights

You have the right to request a copy of your personal data which is held by us about you, or about the person in the home if you have their agreement or legal authority to act for them. You also have the right to have any inaccuracies in the details we hold corrected, the right to object to the use of personal data, the right to restrict specific uses of personal data in certain

circumstances, the right to data portability, the right to withdraw consent, and the right to request deletion of personal data, by means of a request in writing setting out as much detail as possible to privacy@getneare.com. We will respond within one month. Where your data has been deleted or de-identified by us, it will not be possible to act on your request.

If you are in the UK, you can complain to the Information Commissioner's Office (ico.org.uk). If you are elsewhere, we will respect your local regulator. For example, in the US, you can contact the Federal Trade Commission (ftc.gov) or your state Attorney General. In New York, that is the New York State Attorney General's office (ag.ny.gov). You can ask us to access or delete your data at any time, and we will not treat you differently for doing so.

Contact details

Questions, comments, and requests regarding this Privacy and Cookies Statement are welcomed and should be addressed to Subtle Health Limited, Founders Factory, Level 7 Arundel Street Building, 180 Strand, London, WC2R 3DA, or privacy@getneare.com.