



YH2 Medical

Privacy Policy

1. Introduction

Welcome to the YH2 web application ("Application or Service") operated by YH2 Digital Health (Pvt.) Ltd., ("YH2," "we," "us," or "our"). This Privacy Policy outlines our practices regarding the collection, use, and disclosure of personal information when the User ("patient", "you" or "your") uses our Application and related Services including, but not limited to, uploading of health records, remotely accessing patient profiles (including by doctors, nurses, caregivers, and/or other third parties as assigned by the patient), medical history recording, and prescription and lab report storage.

At YH2, we are committed to protecting your personal data and respecting your privacy. Please read this Policy carefully to understand our practices regarding your personal data and how we use information about you, how we keep it safe, and how we protect your privacy.

We are required to comply with the laws and regulations that apply to protecting your data and how it is used as per the Personal Data Protection Act, No. 9 of 2022 (PDPA) in Sri Lanka.

We use your data to provide and improve the Service. By accessing the Application or using the Service, you agree to and are bound by the current version of this Privacy Policy. If you disagree with any part of the current version of this Policy, you may stop using the Service by deleting your account. In doing so, you will no longer be authorized to access the Application and/or use the Service.

2. Information we collect

2.1 Looking after your personal information

We are committed to protecting your privacy and the data we collect and use to provide the Service. We are required to comply with the laws and regulations that apply to protecting your data and how it is used.

This privacy notice applies to any personal data/information provided by the user and automatically collected by us or on our behalf, by any format, including email, online, or through face to face and/or virtual consultations.

2.2 User-provided information

- **Account Information:** When you register on the Application, we collect personal information such as your name, email address, mobile number, date of birth, gender and contact details.
- **Health Information:** Users may voluntarily provide health-related information, including medical conditions, allergies, prescriptions, and other health records.
- **Communication Data:** Information exchanged between users, healthcare professionals, and caregivers within the app or during face to face or virtual consultation.
- **AI Analysis Data:** Where you have enabled the optional AI Analysis Feature (available on premium Subscription Plans), the health documents you have uploaded may be processed using Optical Character Recognition (OCR) technology and artificial intelligence tools for the purpose of generating plain-language interpretation reports. Before any such processing, all personally identifiable information is removed from your data. Only de-identified health data is transmitted to AI processing services. See the section below for full details.

2.3 Automatically collected information

- **Device Information:** We collect device-specific information, including device model, operating system, and unique identifiers.
- **Usage Information:** We gather data on how users interact with the app, including page views, clicks, and feature usage.
- **Log Information:** Server logs may capture details such as IP addresses, access times, and app errors.

2.4 Additional information collected

Depending on your circumstances and the nature of the health care you require, you may voluntarily update certain information about yourself, which may include:

- General details (such as name, address, date of birth, telephone number)
- Details about your general practitioner
- Medical history
- Medications & prescriptions
- Details about your physical or mental health
- Family details (such as your next of kin or emergency contact)
- Ethnicity
- Religious beliefs
- Lifestyle and social circumstances
- Sexual preference
- Scans, x-rays, and other diagnostic images
- Genetic or biometric data

You have the right to receive a copy of your medical records through the Application.

Any voluntary information uploaded, entered, or provided by you to YH2 is solely utilised for the provision of a better user experience and service.

3. How we use your information

- **Personalized Services:** We use the collected information to provide personalized healthcare services, including health record management, patient-caregiver functionality, and communication features.
- **Communication:** We may use contact information to send important notices, updates, and promotional materials. Users can opt out of promotional communications.
- **Analytics and Improvements:** Aggregate and anonymized data may be used for analytics, research, and application improvements.
- **To facilitate your care:** The doctors and other health professionals caring for you need to maintain records about your health and the treatments you have received within the YH2 Application, in order to be able to provide you with the most effective care. It is in your interest as a patient to maintain a full and complete record on the Application, so that accurate, up to date information about you is available during your time of need. The doctors and healthcare professionals can view and edit all or some of the data during consultations.
- **AI Analysis:** Where you have enabled the optional AI Analysis Feature, we use OCR technology and artificial intelligence tools to process your de-identified health data and generate plain-language interpretation reports. This processing occurs only when you explicitly request it and is governed by the de-identification procedures described below.

4. AI Analysis and OCR Data Processing

Premium Subscription Feature

The AI Analysis Feature is available exclusively to users on a premium Subscription Plan. It is entirely optional. You may continue to use the core Platform — including storing, managing, and sharing your health records — without enabling this feature.

Where you have enabled the optional AI Analysis Feature, the following additional data processing takes place:

4.1 What data is processed

When you request AI analysis of a health document, YH2 applies OCR technology to extract text and structured data from that document. The extracted data is then processed by artificial intelligence tools to identify health observations, values, and indicators, and to generate a plain-language interpretation for your reference.

4.2 De-identification before AI processing

Before your health data is transmitted to any external AI processing service, YH2 removes all personally identifiable information (PII) from the data. This includes, but is not limited to, your name, date of birth, Identity Card number, address, contact details, and any other direct identifiers. Only de-identified health data is transmitted externally. Your identifiable personal information is never sent to third-party AI providers.

4.3 Who processes your de-identified data

YH2 engages trusted third-party AI service providers to power the AI Analysis Feature. These providers receive only de-identified data and are contractually bound to use it solely for generating your requested analysis. They are prohibited from using de-identified data for any other purpose. All data transmissions are encrypted in transit using industry-standard protocols. YH2 selects AI service providers who meet applicable data protection standards.

4.4 How AI analysis outputs are used

AI-generated analysis reports are made available to you within your account for your personal reference. With your explicit consent, these reports may also be shared with Healthcare Service Providers you designate through the Platform.

YH2 may use aggregated, fully de-identified AI analysis outputs — from which no individual can be identified — to improve the accuracy and performance of the AI Analysis Feature over time. No identifiable information is used for this purpose.

4.5 Informational purposes only— not medical advice

AI-generated analysis reports are provided for educational and informational purposes only. They are NOT medical advice, a medical diagnosis, treatment recommendations, or a substitute for professional medical consultation. AI Analysis is based on general reference ranges and does not account for your individual medical context. Please confirm the data uploaded in your reports matches the information YH2's AI tools collect. Data uploaded with incorrect reference ranges may cause errors in the accuracy and applicability of AI generated trend reports or other visualization tools. You must always consult a qualified healthcare professional before making any health-related decision.

4.6 Your control

You may disable the AI Analysis Feature at any time through your account settings. Disabling the feature does not affect your access to the core Platform or your stored health records. You may also request deletion of any AI-generated analysis associated with your account by contacting us at support@yh2med.com.

5. Data sharing and disclosure

- **With Your Consent:** We may share your information with third parties when you explicitly consent to such sharing.
- **Healthcare Providers and Caregivers:** For the purpose of facilitating healthcare services, we may share relevant user information with your authorized healthcare providers and caregivers who use the app.
- **AI Service Providers (de-identified data only):** Where you have enabled the AI Analysis Feature, we share de-identified health data with our trusted third-party AI service providers solely for the purpose of generating your requested analysis. These providers are contractually prohibited from using this data for any other purpose.
- **Legal Compliance:** We may disclose information when required by law, legal processes, or to protect our rights and interests.
- **Improve our Services:** We may use some information about you to: manage the healthcare services we provide; help investigate any complaints, claims or incidents; help us to plan new services; help us keep track of spending on our services; assist in clinical audits of the quality of our services.

6. How do we protect your information?

Employees of YH2 have a legal duty to maintain the highest levels of confidentiality, and all YH2 operational staff receive training in how to handle your information securely. Except in certain specific circumstances, your records will generally only be seen by those involved in providing or administering your care.

Your healthcare electronic records held on computer systems are protected by appropriate technology (such as data encryption and access controls). We employ industry-standard security measures to protect all user data from unauthorized access, disclosure, alteration, and destruction. In the event of a breach of your information, you will receive notification in a timely fashion from when YH2 is made aware.

Data transmitted to AI processing services in connection with the AI Analysis Feature is encrypted in transit using industry-standard protocols. Only de-identified data is transmitted, and AI service providers operate under binding data protection agreements.

7. How long do we keep your information?

We will retain your personal information for as long as necessary to provide the Service, comply with legal obligations, resolve disputes, and enforce our agreements. We may also retain your information until you request its deletion and discontinue use of the Service.

AI-generated analysis reports associated with your account are retained for as long as your account is active or until you request their deletion. De-identified data transmitted to AI service providers is not retained by those providers beyond the processing required to generate your analysis.

8. What are your rights?

Under the Personal Data Protection Act, No. 9 of 2022 (PDPA), you have a number of rights as a data subject. You have the right to access, correct, delete, or request the portability of your personal information.

- **The right to be informed:** We are required to inform you about how we collect and use your personal information (for example, by the information given in this Privacy Notice).
- **The right to access:** You are entitled to request a copy of the information we hold about you on the Application and our servers through the mobile app and website.
- **The right to rectification:** You may request that we make changes to any data we hold about you that is incorrect or incomplete through the mobile application and website.
- **The right to erasure:** You can delete the user profile through the web application. Doing so will ensure all your data is deleted and/or removed from access and our servers. You will no longer have access to any of the health information stored during the use of YH2 and may not be able to request us to restore any of your personal details and health records.
- **The right to restrict processing:** You may request that we restrict the processing of your information in certain circumstances. In most cases a restriction of processing is a temporary measure while we investigate your concerns. The right to restrict processing is not an absolute right, and we may decide not to restrict the processing of your information if we consider that processing to be necessary for the purpose of the public interest or for the purpose of your legitimate interests.
- **The right to data portability:** We are not legally obligated to provide your information in a downloadable or machine-readable format. Any information made available through the Application may not be suitable for local storage or transfer. Protecting and securely storing your data once downloaded is solely your responsibility.
- **The right to withdraw consent for AI Analysis:** You may withdraw your consent to the AI Analysis Feature at any time through your account settings. Withdrawal of consent for AI Analysis does not affect the lawfulness of processing carried out before withdrawal, and does not affect your access to the core Platform.
- **Rights related to automated decision making (including profiling):** YH2 may make automated decisions about patients or carry out evaluations based on any automated processes (profiling).

9. Data protection impact assessments

Under PDPA regulations, we are required to carry out a Data Protection Impact Assessment (DPIA) when undertaking new projects which involve the processing of personal data. Completing a DPIA helps us to identify any data risks at an early stage and to take steps to minimise these risks as part of the project development process. These standards will be applied in accordance with local laws or regulations. A DPIA has been conducted in respect of the AI Analysis Feature.

10. Children's Privacy

The YH2 app or website is not intended to be used by those under the age of 13. We do not knowingly collect information from children under 13. If you believe a child has provided us with personal information, please contact us immediately.

11. Changes to this Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in our practices. Users will be notified of material changes.

12. Where can I get further advice?

For questions, concerns, or requests regarding this Privacy Policy, including questions about how your data is used in connection with the AI Analysis Feature, please contact us at support@yh2med.com