

Privacy Policy

Last updated: 14.01.2026

1. Introduction

Optivia Health Ltd (“Optivia”, “we”, “us”, or “our”) respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, store, and share your information when you use our website, mobile app, membership program, laboratory testing, Health Coach support, and optional nutrition and fitness coaching (collectively, the “Services”).

Important: Optivia is not a laboratory or medical provider. All lab testing and coaching services are provided by independent third parties. Health Coaches and optional nutrition/fitness specialists provide educational support only and do not give medical advice, diagnoses, or prescriptions.

We process personal data in compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”), Cyprus data protection laws, and other applicable EU legislation. By using our Services, you consent to the practices described in this Privacy Policy.

2. Data Controller and Contact Information

Optivia Health Ltd is the Data Controller of your personal data.

- **Registered Address:** 11, Ayiou Ioannou, Nicosia, 1016, Cyprus
- **Email:** info@optiviahealth.com

If you have questions about your data or wish to exercise your rights, contact us at the above email.

3. Data We Collect

3.1 Personal Identification Data

- Name, surname, date of birth, gender
- Contact details (email, phone number, address)
- Login credentials

3.2 Membership and Payment Data

- Membership status, subscription details, renewal information
- Payment and billing data (processed securely through third-party payment providers)

3.3 Health and Laboratory Data (Special-Category Data)

- Biological samples and lab results submitted via third-party laboratories
- Self-reported health, nutrition, fitness, and lifestyle data
- Biomarker and wellness data provided by laboratories

You may create an account and access educational content without submitting health data. Participation in lab testing or coaching requires **explicit consent** under Article 9(2)(a) GDPR.

3.4 Health Coach and Coaching Data

- Communications and notes shared with Health Coaches for interpreting lab results and guiding general wellness goals
- Health Coaches do **not provide medical advice or prescriptions**

3.5 Referral Program Data

- Participant name, contact information, and referral code usage for program administration

3.6 Technical and Usage Data

- Device information, IP address, browser type, operating system
- Engagement data, cookies, analytics, and error logs

4. Legal Basis for Processing

We process personal data under the following lawful grounds:

- **Consent:** For processing health data, marketing communications, and optional coaching
- **Contractual necessity:** To provide membership services, lab results, or purchased features
- **Legitimate interests:** To maintain and improve our Services, ensure security, prevent fraud, and develop new features
- **Legal obligation:** To comply with legal or regulatory requirements under Cyprus/EU law

5. How We Use Your Data

We use your information to:

1. Create and manage your account and membership

2. Process payments and subscription renewals
3. Provide optional lab testing and reports
4. Facilitate Health Coach communication and guidance
5. Deliver optional nutrition and fitness coaching (if purchased)
6. Operate and improve and other digital tools
7. Send administrative updates, security alerts, and service communications
8. Conduct research, analytics, and product improvement using anonymized or aggregated data
9. Comply with legal obligations and respond to lawful requests

We do not use your personal or health data for automated decision-making with legal or similarly significant effects.

6. Sharing and Disclosure

We share data only as necessary and in compliance with GDPR:

Recipient	Purpose	Legal Safeguard
Third-party laboratories	Sample analysis and lab reports	Data Processing Agreement + explicit consent
Health Coaches	Explain results and guide general wellness	Contractual necessity
Nutrition & fitness coaches (optional)	Support services if opted in	Explicit consent
Service providers (hosting, analytics, AI)	Operate and secure our platforms	GDPR-compliant processors
Regulatory authorities	Where legally required	Legal obligation

We **never sell or rent your data** to third parties.

7. International Data Transfers

If data is transferred outside the EEA, we ensure protection via:

- European Commission adequacy decisions
- Standard Contractual Clauses (SCCs) approved by the EU
- Other GDPR-compliant safeguards

8. Data Retention

- Personal data is retained only as necessary for service purposes.

- Health and lab data may be retained for legal, regulatory, or audit purposes, typically up to 7 years.
- Upon account deletion or membership cancellation, data will be securely deleted or anonymized unless required by law.

9. Data Security

We implement technical and organizational measures, including:

- Encryption of storage and transmission
- Access control and authentication
- Staff training and compliance monitoring

No system is completely immune to unauthorized access, despite industry-standard protections.

10. Your Rights Under GDPR

You may:

1. Access your data
2. Rectify inaccuracies
3. Request erasure (“right to be forgotten”)
4. Restrict processing under certain conditions
5. Receive data in a structured, machine-readable format (data portability)
6. Object to processing for legitimate interests or direct marketing
7. Withdraw consent at any time without affecting prior lawful processing
8. File a complaint with the Office of the Commissioner for Personal Data Protection (Cyprus)

Contact: info@optiviahealth.com to exercise your rights.

11. Cookies and Tracking

We use cookies to enhance functionality and analyze usage:

- Essential cookies – required for website operation
- Analytics cookies – improve content and user experience
- Marketing cookies – used only with your consent

You can manage cookies via your browser or our consent tool.

12. Referral Program

- Data is processed to manage referrals, track eligibility, and issue rewards
- You may opt out at any time by contacting info@optiviahealth.com

13. Marketing Communications

- We may send promotional messages with your consent
- You may unsubscribe at any time via the “unsubscribe” link or by contacting us directly

14. Changes to This Policy

We may update this Privacy Policy to reflect legal, regulatory, or operational changes.

- Material updates will be communicated via email or app notifications

15. Contact

For questions or concerns about this Privacy Policy or our data practices:

Optivia Health Ltd

- Email: info@optiviahealth.com
- Address: 11, Ayiou Ioannou, Nicosia, 1016, Cyprus