



# **FITFILE Group Limited**

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Disclosure Report

Date Submitted: February 1st, 2024



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## Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- 1) Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

**This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company**



# Disclosure Questionnaire

## Industries and Products

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Please indicate if the company is involved in production or trade in any of the following. Select Yes for all options that apply. |                          |                                     |
| Animal Products or Services   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Biodiversity Impacts  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Chemicals   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Disclosure Alcohol  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Disclosure Firearms Weapons   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Disclosure Mining   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Disclosure Pornography  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Disclosure Tobacco  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Energy and Emissions Intensive Industries   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Fossil fuels Gambling   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Genetically Modified Organisms  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Illegal Products or Subject to Phase Out  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Industries at Risk of Human Rights Violations   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Monoculture Agriculture   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Nuclear Power or Hazardous Materials  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Payday, Short Term, or High Interest Lending  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Water Intensive Industries  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Tax Advisory Services   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## Outcomes & Penalties

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply. |                          |                                     |
| Anti-Competitive Behavior   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Breaches of Confidential Information  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Bribery, Fraud, or Corruption   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Company has filed for bankruptcy  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Consumer Protection   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Financial Reporting, Taxes, Investments, or Loans   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Labor Issues  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Large Scale Land Conversion, Acquisition, or Relocation   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Litigation or Arbitration   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| On-Site Fatality  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Penalties Assessed For Environmental Issues   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Political Contributions or International Affairs  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Recalls   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Significant Layoffs   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Violation of Indigenous Peoples Rights  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



## Practices

|  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No." |                          |                                     |
| Animal Testing   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Company prohibits freedom of association/collective bargaining   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Company workers are prisoners  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Conduct Business in Conflict Zones   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Confirmation of Right to Work  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Does not transparently report corporate financials to government   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Employs Individuals on Zero-Hour Contracts   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Facilities located in sensitive ecosystems   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ID Cards Withheld or Penalties for Resignation   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| No formal Registration Under Domestic Regulations  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| No signed employment contracts for all workers   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Overtime For Hourly Workers Is Compulsory  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Payslips not provided to show wage calculation and deductions  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|  | Yes                                 | No                                  |
|--|-------------------------------------|-------------------------------------|
| <a href="#">Sale of Data</a>                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| Tax Reduction Through Corporate Shells               | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Workers cannot leave site during non-working hours   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Workers not Provided Clean Drinking Water or Toilets | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Workers paid below minimum wage                      | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Workers Under Bond                                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Other  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

## Supply Chain Disclosures

|   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| Please indicate if any of the following statements are true regarding your company's significant suppliers. |                          |                                     |
| Business in Conflict Zones  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Child or Forced Labor   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Negative Environmental Impact   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Negative Social Impact  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



# Disclosure Questionnaire Statement

**Disclosure Questionnaire Category: Selling or Providing Access to Consumer or User Data**

| <b>Topic</b>  | Sharing User Data to Clients   |
|---|--|
| <b>Summary of Issue</b>   | FITFILE is a health data technology company offering data access, privacy and linkage solutions. The company connects difficult-to-access data silos.  |
| <b>Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)</b> | 100% of companies annual revenue is generated through providing data access and linkage in a privacy-preserving way for direct health care, planning and research. FITFILE does not earn any revenue/do not advertise on the cookies data.   |
| <b>Impact on Stakeholders</b>   | <p>FITFILE exists to better integrate and safely provide individuals' data to all those who can improve their health and well-being.</p> <p>Data relevant to individuals' health and activity is accessed/processed/collected by FITFILE from healthcare systems (e.g. secondary care, primary care) and any other relevant third-party data sources (activity metrics, socio-economic, environmental etc).</p> <p>The data may include personal data, and depending on the purpose of the data processing and contractual or governance agreements, that personal data may be collected or viewed by FITFILE as an approved Data Processor on behalf of that data's Data Controller.</p> <p>Once the platform can access data, each access of the data is strictly controlled by its Data Controller's authorisation, and overlaid with Role Based Access Control (RBAC) and audited. FITFILE categorises its reasons for accessing health data to be for direct care, healthcare planning or health research purposes.</p> <p>FITFILE has a <a href="#">Privacy Policy</a> online that is accessible and informs users of the purpose for collecting user data, the type of data collected and who the user data is being shared with.</p> <p>The company discloses information such as name of the entities who are the recipients of the data to the users through the responsible Data Controllers of a contract and information is then available within the FITFILE platform.</p> |

|   |  |
|---|--|
|   | FITFILE keeps a register of personal data which is updated in predefined intervals; all data is encrypted. The company operates on a principle of least privilege; where strict RBAC is enforced, and it operates input-process-output as well as a number of technical controls.  |
| <b>Implemented Management Practices</b> | <p>In ensuring that better data is available for health research, planning or care, all FITFILE products and processes always preserve privacy, safeguard data and defend individuals' rights.</p> <p>Besides being in compliance with the <a href="#">EU General Data Protection Regulation (GDPR)</a>, the company is also certified by the <a href="#">ISO/IEC 27001</a> (the international standard for information security) and the <a href="#">Cyber Essential Plus (CE+)</a>. FITFILE is also compliant with the <a href="#">Data Security and Protection Toolkit (DSTP)</a> and the <a href="#">DCB0129: Clinical Risk Management Standard</a>.</p> <p>To ensure the protection of the user data that is shared, all data is encrypted in transit and at rest, and secure channels are always used for the transfers. FITFILE also uses data cryptography, security controls and de-identification processes. FITFILE further employs a Data Protection Officer to ensure correct and safe handling of user data.</p> |
| <b>Report</b>                           | <p>FITFILE's policies on cookies and privacy are available at the following link.</p> <p><a href="https://fitfile.com/files/privacy-policy.pdf">https://fitfile.com/files/privacy-policy.pdf</a></p>   |