

WHISPER HEALTH

Privacy Notice

How Whisper Health handles personal information
and sensitive health information.

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2.1 Scope and role

This notice explains how Whisper Health handles personal information when you visit, register for, or use the Services. It should be read with the Terms of Service, Cookie Policy, and any notice shown in a specific feature or order flow.

Whisper Health is operated by WHISPERSAFE HEALTH CONSULT. For data-protection purposes, it is intended to act as the controller for information it decides how and why to use. A partner such as a pharmacy, clinician, payment provider, or delivery provider may independently control information it needs for its own service. Their privacy information may also apply.

2.2 Ghana data-protection context

This notice is designed to support the principles in Ghana's Data Protection Act, 2012 (Act 843), including lawful and transparent processing, purpose limitation, data quality, security safeguards, and data-subject participation. Health information may receive additional protection as special personal data under the Act.

The Ghana Data Protection Commission is the statutory data-protection regulator. Its public website is <https://dataprotection.org.gh/>. The Ministry of Health Health Information System Strategic Plan 2022-2025 informs our health-information governance objectives. Neither reference means Whisper Health is approved, certified, registered, or endorsed by either body unless separately confirmed in writing.

2.3 Information we may collect

The information we process depends on the feature you use. It can include:

- Account and contact information: name or chosen display name, email address, telephone number, account identifier, login and recovery information.
- Profile and preferences: profile details, language, notification choices, and accessibility or service preferences you provide.
- Health and sensitive information: health questions, symptoms, wellbeing inputs, consultation-related information, messages, uploaded health records, prescriptions, and other information you choose to provide.

- Consultation information: appointment requests, booking times, provider-related records, communications, and any information necessary for the relevant workflow.
- Community information: posts, comments, images, reports, moderation records, and visibility choices.
- Pharmacy-order information: items requested, order status, final price, delivery area, exact delivery details when needed after a final quote, pharmacy fulfilment messages, and customer-support records.
- Payment information: payment reference, amount, status, and reconciliation information. Payment credentials are handled by the payment provider's hosted checkout rather than collected by Whisper Health through the checkout form.
- Technical and security information: device and browser data, IP-related security information, log records, session records, error reports, and activity needed to prevent misuse and secure accounts.
- Support and feedback: communications, complaint details, attachments, and feedback you send us.

2.4 Sources of information

We collect information directly from you, automatically from your device or browser when you use the Services, from a person authorised to act for you, and from providers or partners where needed to complete a feature you requested. For example, a payment provider may confirm whether a transaction was successful, and a pharmacy may return an availability or fulfilment status.

We do not require you to provide every category of information. However, if information is necessary for account security, a consultation, a lawful pharmacy order, payment verification, or delivery, we may be unable to provide that feature without it.

2.5 Why we process information

We may process personal information to:

- create, secure, and administer accounts;
- provide the health information, AI, consultation, community, pharmacy-order, payment, delivery, and support features you request;
- personalise settings you choose and maintain service continuity;

- protect users, prevent fraud, investigate misuse, enforce our terms, and maintain system security;
- communicate important service, safety, payment, order, or policy messages;
- meet legal obligations and respond to valid legal requests;
- resolve complaints, disputes, refunds, or chargebacks; and
- improve reliability, accessibility, and safety using appropriately minimised and protected operational information.

We do not sell health information or use health conversations for behavioural advertising. We do not use your health information to make an automated decision with legal or similarly significant effect without a separate, clear notice of the relevant process and safeguards.

2.6 Basis and additional protection for health information

We will identify and document an appropriate lawful basis before processing personal information. Depending on the feature, this may include your consent, steps you ask us to take before entering a service arrangement, performance of a service you requested, a legal obligation, protection of vital interests, or another lawful basis recognised by applicable law.

Because health information is sensitive, we will apply heightened controls and only process it for a specific, explained purpose. Where consent is the appropriate basis, we will request it in a clear form and explain how it can be withdrawn. Withdrawing consent does not affect processing already carried out lawfully and may prevent a feature from operating.

2.7 Who receives information

We limit access to people and organisations with a legitimate need to receive it. Depending on the Service, recipients can include authorised Whisper Health staff, contracted service providers, a consultation provider, a participating pharmacy, a delivery provider, a payment provider, professional advisers, regulators, law-enforcement bodies, or another recipient where required or permitted by law.

For pharmacy orders, we share only the information needed to check availability, obtain a final quote, fulfil an accepted order, and resolve an issue. We do not show a user a partner-by-partner price comparison or disclose a pharmacy identity in the ordinary availability flow unless this becomes necessary to fulfil the order, law requires it, or we clearly tell the user otherwise.

All processors handling personal information on our behalf must be subject to an appropriate written arrangement and access controls before production use.

2.8 International processing and transfers

Some technology providers may process personal information outside Ghana. Before using an international provider for personal information, we will assess the transfer, the provider's safeguards, and the lawful transfer mechanism required by applicable law. On request, we will provide available information about the relevant safeguards, subject to security and confidentiality restrictions.

2.9 Security measures

We use a combination of administrative, technical, and organisational controls appropriate to the sensitivity of the information and the risks involved. These may include role-based access, authentication controls, session controls, encryption for applicable sensitive data, logging, monitoring, vendor review, secure development practices, and incident-response procedures.

No internet service can guarantee absolute security. You should use a unique, strong password; keep recovery information private; log out of shared devices; and tell us immediately if you suspect unauthorised access.

2.10 Retention and deletion

We keep information only for as long as needed for the purpose collected, an active service relationship, security and fraud prevention, legal or regulatory duties, financial reconciliation, dispute handling, or the establishment, exercise, or defence of legal claims. When the retention period ends, we will delete, anonymise, or securely archive the information as appropriate.

2.11 Your rights and choices

Subject to applicable law and identity verification, you may ask us to explain how we use your personal information, request access to information we hold about you, ask us to correct inaccurate information, object to certain processing, withdraw consent where applicable, request deletion where appropriate, ask about international safeguards, or make a complaint.

To make a request, contact support@whisperhealth.com and state that it is a privacy request. We may ask for enough information to verify your identity and protect your account. We will not charge a fee for a reasonable request unless applicable law permits it, and we will explain if we cannot fully comply because of a lawful exception.

You may also complain to the Ghana Data Protection Commission. Contact information is available at <https://dataprotection.org.gh/>.

2.12 Automated tools, AI and human judgement

Some features may use automated systems, including AI, to generate informational responses, detect abuse, route support, or operate the Service. These systems may make mistakes. They are not a replacement for clinical judgement, and they must not be used as the sole basis for an emergency, diagnosis, prescription, or treatment decision.

Where a process makes a significant decision about you, we will provide an appropriate explanation, human-review route, or other safeguard required by applicable law.

2.13 Children and young people

We will not knowingly collect a child's personal information in a manner that violates applicable law. Before launching features for minors, Whisper Health must adopt and implement the age, consent, guardian-verification, safety, and deletion rules identified in the publication checklist.

2.14 Data incidents

If we become aware of an actual or suspected personal-data incident, we will investigate, contain, document, and assess it. Where notification is required by applicable law, we will notify affected individuals and/or the relevant authority with the information and within the time required by law.

2.15 Changes and contact

We may update this notice when our Services, laws, or processing practices change. The updated notice will carry a new version and effective date. For material changes, we will take reasonable steps to provide advance notice where appropriate.

For privacy questions or rights requests, contact support@whisperhealth.com.