

FertilityOS Privacy Policy

Sep 29, 2026

1. About this policy

This policy explains how FertilityOS handles your personal information, including your health information. FertilityOS is operated by [Simtail Group Pty Ltd] (ABN [41620815545] of [31 Gill Street Mosman Park WA Australia] ("FertilityOS", "we", "us").

It applies to our website, the FertilityOS patient portal and app, our ebook and audiobook, our email communications, and any clinic that uses FertilityOS to support its patients (together, the "Services").

We are bound by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs). Health information is "sensitive information" under that Act, and we treat it with a higher standard of care.

By using the Services you acknowledge this policy. Where we rely on your consent, we ask for it separately and clearly, and you can withdraw it at any time (see section 3).

2. What we collect

We only collect information that is reasonably necessary to provide the Services. The table below sets out what we collect and where it comes from.

Category	Examples	Where it comes from
Account and contact details	Name, email address, password (stored encrypted), time zone	You
Health information	IVF stage, consultation notes, test results (such as AMH, follicle counts, egg, embryo and transfer outcomes), medications and medication requests, appointments, check-ins, symptoms, mood and reflections, files you upload	You, and your clinic if your account is linked to one
Payment details	Purchase history, billing name, the last four digits of your card	Stripe, our payment processor. We never see or store your full card number

Category	Examples	Where it comes from
Usage and device information	Pages visited, features used, device and browser type, IP address, approximate location, cookie identifiers	Collected automatically when you use the Services
Communications	Emails, support requests and feedback you send us	You
Clinic staff details	Name, work email, role and activity in the clinic dashboard	The clinic, or the staff member

You don't have to give us health information. You can use parts of the Services, such as the website and ebook, without it. Some portal features only work if you enter your details.

Cookies and analytics. We use essential cookies to keep you signed in and secure. With your consent, we also use [analytics tools, e.g. Google Analytics / Plausible] to understand how the Services are used. We do not use health information for advertising, and we do not allow advertising platforms to track your health activity in the portal.

Anonymity. You can browse our website and contact us with general questions without identifying yourself. You'll need to identify yourself to create an account, buy a product or use the portal.

3. How we use your information

We use your information to:

- create and manage your account, and keep it secure
- provide the portal features you choose to use, such as stage tracking, reminders, two-week-wait meditations and medication request routing
- share information with your clinic, where you have linked your account (see section 4)
- process payments and deliver the products you buy
- send you service messages, such as receipts, security alerts and reminders you've set
- respond to your questions and complaints
- maintain, fix and improve the Services
- meet our legal obligations

Consent for health information. We collect and use your health information only with your consent, or where the law requires or allows it. We ask for consent in layers, so you can agree to core portal features without agreeing to optional uses.

Optional research and product-improvement use. If you opt in, we may use **de-identified** information about your journey (information that no longer identifies you) to improve FertilityOS, understand patient experience and adherence, and produce aggregated insights. We may share those aggregated, de-identified insights with clinics, researchers or partners. This is off by default. Saying no doesn't affect your access to the Services, and you can change your choice at any time in your account settings.

AI features. Some features, such as reflections and general-education Q&A, use an AI model provided by [Anthropic, PBC]. When you use them, the text you enter is sent securely from our servers to that provider to generate a response. Under our agreement, the provider does not use this data to train its models. AI responses are general education only. They are not medical advice or an interpretation of your results (see our Medical Disclaimer).

Automated decisions. [Confirm before 10 December 2026.] We do not use computer programs to make decisions that significantly affect your rights or interests. Where the clinic dashboard highlights patients who may need follow-up, a clinician always reviews and decides what to do.

What we don't do. We don't sell your personal information. We don't use your health information for advertising or targeting, and we don't share it with social media or advertising platforms.

4. Who we share it with

Your clinic. If you link your account to a clinic that uses FertilityOS, the information you choose to share becomes visible to authorised staff at that clinic. You'll see exactly what is shared before you link. You can unlink at any time, although your clinic may keep records it already holds under its own privacy obligations. Staff at other clinics can't see your information.

Service providers. We use trusted providers to run the Services. They may only use your information to provide their service to us.

Provider	What they do	Where data may be held
[Supabase]	Database, sign-in and file storage	[Region, e.g. Sydney, Australia]
[Stripe]	Payments	United States and other countries
[Anthropic]	AI features	United States

Provider	What they do	Where data may be held
[Email provider]	Account and marketing emails	[Country]
[Hosting and analytics providers]	Website hosting and usage analytics	[Country]

Overseas disclosure. Some providers store or process information outside Australia, including in the United States. Before disclosing personal information overseas, we take reasonable steps to make sure the recipient handles it consistently with the APPs, including through contracts.

Other disclosures. We may also disclose information:

- to professional advisers, such as lawyers and auditors, who are bound by confidentiality
- where the law requires or authorises it, or to lessen or prevent a serious threat to someone's life, health or safety
- to a buyer, investor or successor if all or part of our business is sold, merged or restructured. The information stays protected by this policy, and we'll tell you before it becomes subject to a different policy.

5. Security

We protect your information with encryption in transit and at rest, strict access controls that keep each patient's data separate from other patients and from clinics you haven't linked to, audit logging of staff access, and regular review of our security practices. No system is completely secure, so please keep your password private and tell us straight away if you think your account has been compromised.

6. How long we keep it

We keep your information while your account is active and for as long as we need it for the purposes in this policy or to meet legal obligations, such as tax records. When you delete your account, we delete or de-identify your personal information within [30] days. The exceptions are information we must keep by law, and backups, which are overwritten within [90] days.

7. Data breaches

If a data breach is likely to cause you serious harm, we will notify you and the Office of the Australian Information Commissioner (OAIC) as required by the Notifiable Data Breaches scheme.

8. Your rights

You can ask to access the personal information we hold about you, or to correct it. You can also withdraw a consent or ask us to delete your account. Many of these can be done in your account settings. Otherwise, email us. We'll respond within 30 days and won't charge you to make a request. If we refuse, we'll explain why in writing and tell you how to complain.

9. Marketing

We only send marketing emails if you've agreed to receive them, as required by the *Spam Act 2003* (Cth). Every marketing email has an unsubscribe link. Service messages, such as receipts and security alerts, are sent regardless.

10. Age

The Services are for people aged 18 and over. We don't knowingly collect information from anyone under 18.

11. Complaints

If you're concerned about how we've handled your information, contact us first. We'll acknowledge your complaint within 7 days and aim to resolve it within 30 days. If you're not satisfied, you can complain to the OAIC at [oaic.gov.au](https://www.oaic.gov.au) or on 1300 363 992.

12. Changes to this policy

We may update this policy from time to time. If we make significant changes, we'll tell you by email or in the portal before they take effect. The date at the top shows when it was last updated.

13. Contact us

Privacy Officer, [Simtail Group Pty Ltd] Email: [privacy@fertilityos.com]