

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



Welcome

This Privacy Policy explains what personal data LifeThreads collects, why we collect it, how we keep it safe, and what rights you have over it. Written in plain English — because privacy matters and you should understand exactly what you are agreeing to.

1. Who we are

LifeThreads is the trading name of Life&Others Limited.

LifeThreads is operated by Life&Others Limited, a company registered in England and Wales (Company Registration Number 17097772, ICO Registration Number ZC107933). We are a personal data management app that lets you store, organise and securely share important personal information with the people you trust.

For data protection purposes, Life&Others Limited is the Data Controller — meaning we are responsible for how your data is used and protected.

1.1 Applicable law

LifeThreads is operated by Life&Others Limited, a company registered in England and Wales. This Privacy Policy is written primarily in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which are the laws that govern our processing of personal data as a UK-registered business.

Where we refer to GDPR Article numbers throughout this policy (for example, Article 6 or Article 9), these references are to the UK GDPR unless stated otherwise. The article numbers in the UK GDPR and the EU GDPR are identical, so these references apply equally to both instruments.

If you are based in the European Union, the EU General Data Protection Regulation (EU GDPR) 2016/679 also applies to the processing of your personal data, by virtue of its extra-territorial reach under Article 3. Our practices and your rights are the same under both instruments. If you are based in the EU and wish to raise a concern, you also have the right to contact your local EU data protection authority.

We also comply with the Privacy and Electronic Communications Regulations 2003 (PECR), which governs our use of cookies and electronic communications. Full details are in our Cookie Policy.

2. How LifeThreads works — the key concepts

Understanding the structure of the app helps explain how we handle your data.

The LifeThreads structure: Threadballs, Threads and Strands

LifeThreads is built around three connected concepts:

THREADBALL — A Threadball represents a person. You can create one for yourself or for someone else such as a partner, parent, or child. A Threadball is the top-level profile that holds all of that person's information.

THREAD — A Thread is a category of life information within a Threadball. Examples include: Health, Identity, Work, Education, Home, Insurance, Travel and Money. A Threadball can contain multiple Threads.

STRAND — A Strand holds a specific piece of data within a Thread. For example, within a Health Thread: Medication, Diagnosis, Immunisation. Within an Identity Thread: Passport, Driving Licence, Residence. You can share a whole

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



Threadball, a single Thread (and all the Strands within it), or an individual Strand — at your discretion and with your chosen access level.

3. Threadballs — profiles for people in your life

A Threadball represents a person. This section explains what that means for data privacy.

3.1 Creating a Threadball

When you create a Threadball for another person, you are storing personal data about them. Under UK and EU data protection law, this makes you a data controller for that person's data — the legal responsibility for using that data lawfully rests with you, not with LifeThreads.

Before creating a Threadball for another person, you must be satisfied that at least one of the following applies:

- You have that person's knowledge and written consent to store their information
- You are a parent or legal guardian of a minor, acting in their best interests
- You hold a Lasting Power of Attorney (LPA) or equivalent legal authority to act on their behalf
- There is another clear lawful reason under GDPR Article 6 (and Article 9 for sensitive data) for you to store their information

Your responsibility — please read this

LifeThreads provides the technology but cannot verify whether you have obtained consent from the people whose data you store. By creating a Threadball for another person, you confirm to us that you have a lawful basis for doing so. If you store someone's data without their knowledge or a lawful reason, you may be in breach of GDPR — and that responsibility lies with you personally, not with LifeThreads.

3.2 Joint Owners — shared management of a Threadball

A Joint Owner is a person you grant full collaborative access to a Threadball. Joint Owners can create, edit and delete Threads and Strands within that Threadball, and can invite other people to become Joint Owners.

What Joint Owners can do

Joint Owners have the same management rights as the person who created the Threadball. They can: (1) Create, edit and delete Threads and Strands (2) Share the Threadball, individual Threads or Strands with others (as Joint Owner or read-only level) (3) Invite additional people to become Joint Owners. Joint Owners cannot view or access any other Threadballs, Threads or Strands that have not been shared with them.

When a Joint Owner is added, or when any Joint Owner sends a new Joint Owner invitation, all existing Joint Owners of that Threadball are automatically notified. This is a deliberate safeguard — it ensures no one can be silently added to the management of a Threadball without the knowledge of all current Joint Owners.

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



Joint Owner responsibility

By accepting Joint Owner status, a person takes on a shared responsibility for the lawful use of the Threadball data. If a Joint Owner creates or stores data about the Threadball subject without a lawful basis, that responsibility rests with that Joint Owner personally — not with LifeThreads. Joint Owners should satisfy themselves that they have a legitimate reason to access and manage the data before accepting.

To facilitate the notification mechanism described above, LifeThreads processes the name and email address of Joint Owners as part of the invitation and notification flow. This processing is necessary to operate the safeguard and is carried out on the basis of our legitimate interests in maintaining the security and integrity of Threadball access (GDPR Article 6(1)(f)).

In-app and email notifications for Joint Owners

When a Joint Owner invitation is sent, or a new Joint Owner is added to a Threadball you manage, you will receive: (1) An in-app notification within the LifeThreads app (2) An email notification to your registered email address. These notifications will include the name of the person who took the action and the name of the Threadball affected. They will not include the contents of any Strands or Threads. You can manage your notification preferences in Settings > Notifications.

3.3 Sharing — three levels, two access types

LifeThreads allows you to share data at three levels:

- Whole Threadball — the recipient can see all Threads and all Strands within the Threadball
- Single Thread — the recipient can see all Strands within one specific Thread (for example, the full Health Thread) but cannot see any other Threads
- Individual Strand — the recipient can see only one specific piece of data (for example, just the Passport Strand)

For each share you also choose the access type:

- Joint Owner — can create, edit and delete within the shared Threadball (see Section 3.2)
- Read-only — can view the shared data only; cannot edit, delete or create any content; does not receive notifications about changes to the Threadball, Thread or Strand

All share requests must be actively accepted by the recipient before any access is granted. Recipients can decline, hide or archive share requests. A share request that is not accepted grants no access.

Read-only access — what it means

A read-only recipient can view the data you have shared with them through the LifeThreads app. They cannot edit, delete or create any Strands, Threads or Threadball data. They will not receive any notifications about changes, updates or new invitations related to the shared content. Their access is purely to view the information you have chosen to share. You can revoke read-only access at any time.

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



Revoking access

You can revoke any share — Joint Owner or read-only — at any time through the app. Revocation immediately removes the person's access going forward. Technically, revoking destroys that person's copy of the decryption key — your own keys are unaffected. We cannot undo data that has already been viewed — if a recipient viewed content before revocation, that information may remain in their possession.

Revocation and downloaded copies

Revoking access removes a person's ability to view your data through the LifeThreads app from that point forward. However, if a recipient downloaded or exported any data before access was revoked, those copies exist outside LifeThreads and are beyond our control. We cannot delete or retrieve them. You should only share data with people you trust, and think carefully before sharing sensitive Strands with anyone who may download or retain a copy.

3.4 Threadballs for children

Parents or legal guardians may create Threadballs for children under 16. You are responsible for ensuring the data is stored and shared appropriately and in the child's best interests. When a child turns 16, they may contact us at privacy@lifethreads.co.uk to request access to, correction of, or deletion of any Threadball data that relates to them. Data regarding children under 16 is processed under Art. 9(2)(c) (vital interests) or Art. 9(2)(g) (substantial public interest) as applicable, or that the parent/guardian's consent covers Art. 9 as well as Art. 6 of the EU General Data Protection Regulation, as incorporated into UK law by the Data Protection Act 2018.

3.5 Threadballs for adults who cannot consent for themselves

If you are creating a Threadball for an adult who lacks mental capacity — for example, a parent with dementia — you should hold a valid Lasting Power of Attorney (LPA) or equivalent legal authority before doing so. We recommend keeping a copy of that authority in a safe and accessible place.

3.6 What LifeThreads does with Threadball data

LifeThreads stores and protects Threadball data, making it available only to the people you choose to share it with. We do not:

- Read or analyse the contents of any Threadball, Thread or Strand for any commercial purpose
- Share data with anyone except those you explicitly grant access to
- Use Threadball data for advertising or profiling
- Retain data after deletion — permanently purged within 30 days from live systems and 90 days from all backups

4. What data we collect — and why

We only collect what we genuinely need to operate the app.

4.1 Data you give us directly

- Your name and email address — to create your account and allow you to log in
- Your date of birth — to confirm you meet the minimum age requirement (16+)
- Personal data you store in your profile and in any Threadball, Threads and Strands you create

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



- Sharing permissions — who you grant access to, at what level, and whether they have accepted
- Document and file attachments you upload as Strands — encrypted before storage
- Messages you send to our support team

4.2 Data collected automatically

- Device type and operating system — to ensure the app works correctly on your device
- Crash reports and error logs — to identify and fix technical problems; no personal Strand content is included
- Login timestamps, device records and authentication events — for your security
- Anonymised, aggregated feature usage — to improve the app; never tied to your identity

Our data promise

We never collect your location. We never read the contents of your Strands, Threads or Threadball profiles for advertising purposes. We never sell your data to anyone, ever.

5. How we keep your data safe

Keeping your data secure is one of our most important responsibilities.

All data you store in LifeThreads — including every Threadball, Thread, Strand and any documents you upload — is encrypted on your device before it is transmitted to us. Every record is encrypted with its own key, and those keys are protected by a master passphrase that only you hold. What reaches our servers is already encrypted, and is stored in that form — we cannot read what is inside your records, and neither can anyone with access to our storage .

Your password is stored in a form that cannot be read or recovered by anyone, including us. When you log in, we use a two-step verification process — your password plus a second verification code — to confirm it is you.

Your master passphrase and your 12-word recovery key protect the keys to your encrypted records. They never leave your device, and we never see them. If you forget your passphrase, your recovery key is the only way to regain access — we cannot reset it for you. If both are lost, your encrypted records cannot be recovered by anyone, including us. This is a deliberate design choice: it is what keeps your data truly private.

Your data is stored on servers located within the European Economic Area (EEA) using AWS (Amazon Web Services). We do not transfer your personal data outside the EEA in the ordinary course of providing the service. All sensitive application credentials are stored as encrypted secrets and are never committed to code.

To operate the service, a limited amount of information is necessarily visible to us in readable form: your account email address and display name, the names used to label shared Threadballs, Thread category labels, records of who shares with whom, and security logs such as login timestamps. This operational information never includes the contents of your Strands, Threads or uploaded documents.

When you scan a document with the in-app scanner, the text is read on your device itself. No third party ever processes the contents of your records.

We apply strict access controls so that only authorised systems and personnel can reach your data. We carry out regular security reviews and maintain a documented process for responding to any security incidents.

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



If something goes wrong

In the unlikely event of a data breach that puts your rights at risk, we will notify the UK ICO within 72 hours of becoming aware of the breach, and contact you directly as soon as it is safe to do so.

6. Lawful basis for processing

Data protection law requires us to have a valid reason — called a lawful basis — for every type of data processing we carry out.

- **Explicit consent (GDPR Art. 6(1)(a) and Art. 9(2)(a))** — for storing and sharing special category data such as health records, and for Threadball data about other individuals where the subject is capable of consenting and no other basis applies. You may withdraw consent at any time; however, withdrawal may limit or remove access to affected Threadball data going forward.
- **Vital interests (GDPR Art. 6(1)(d) and Art. 9(2)(c))** — as a secondary basis where the Threadball subject cannot consent for themselves — for example, a child's health data stored by a parent, or health and care data stored under a Lasting Power of Attorney for an adult who lacks mental capacity. In these cases, processing is necessary to protect the vital interests of the data subject.
- **Performance of a contract (GDPR Art. 6(1)(b))** — to deliver the service you signed up for, including account management, authentication and data storage
- **Legitimate interests (GDPR Art. 6(1)(f))** — for security monitoring, fixing technical problems, and for Joint Owner notifications (see Section 3.2), where these do not override your fundamental rights
- **Legal obligations (GDPR Art. 6(1)(c))** — where the law requires us to retain or process certain data

Special category data — highest protection

Certain Threads and Strands — including Health (Medication, Diagnosis, Immunisation) and financial data — constitute 'special category' data under GDPR Article 9. This data carries the highest level of legal protection. We process it only on the basis of your explicit consent, and only to provide the service you have requested.

Automated decision-making (Art. 22) - LifeThreads does not currently make any decisions about you based solely on automated processing that produce legal or similarly significant effects. No profiling of this kind takes place. If we introduce any feature that involves automated decision-making of this nature in the future, we will update this policy, notify you in advance, and ensure your Art. 22 rights are fully respected before that feature goes live.

7. Sharing your data

7.1 Sharing with other users — your control

All sharing within LifeThreads is initiated by you and requires active acceptance by the recipient before any access is granted. You control what is shared (Threadball, Thread or individual Strand), with whom, and at what level (Joint Owner or read-only). You can revoke any share at any time. Read-only recipients can only view the shared content and receive no notifications about changes.

7.2 Third-party service providers

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



We work with a small number of carefully selected third-party providers to operate the app. All providers are bound by Data Processing Agreements (DPAs) and are prohibited from using your data for their own purposes. The providers we use include:

- Application hosting, database and data storage: AWS (Amazon Web Services), EEA-based servers — including Amazon Cognito for account sign-in
- Email delivery (OTPs, notifications, support): Resend
- Address lookup: GetAddress / Ideal Postcodes

We will never sell your data

We do not sell, rent or trade your personal data — or any Threadball, Thread or Strand data — to third parties. No exceptions. We do not use advertising networks or data brokers.

8. Data retention

- **Active account:** all data retained while your account remains active and as needed to provide the service
- **Deleted Strand or Thread:** removed from live systems within 30 days, from all backups within 90 days
- **Deleted Threadball** - all associated Threads and Strands removed within 30 days from live systems and 90 days from backups
- **Closed account** - the encryption keys for your records are destroyed at deletion, making the data immediately unreadable; the encrypted data itself is then permanently deleted within 30 days from live systems and 90 days from all backups
- **Consent and deletion proof** — a hashed (unreadable) record of your email address is retained after account deletion, solely as proof of consent and deletion for the establishment, exercise or defence of legal claims
- **Records you added to someone else's Threadball** — closing your account does not delete Strands or Threads you added to a Threadball owned or jointly owned by someone else; those records remain with that Threadball and its owners
- **Joint Owner notification records** - metadata only (the name and email address of the person who sent or accepted an invitation, the name of the Threadball affected, and the date and time of the action) is retained for up to 12 months for security audit and accountability purposes. This retention is strictly limited to this metadata. No Strand, Thread or Threadball content is retained under this provision. When an account is closed, all Strand, Thread and Threadball content is deleted within 30 days as stated above - the 12-month retention applies only to the invitation and notification log
- **Legal minimum records** (e.g. billing): retained for up to 7 years where required by law

9. Your rights

You are in control of your data. Here is what you can ask us to do.

Your right	What it means in practice
See your data	Request a copy of all personal data we hold, including all Threadball, Thread and Strand data you have created (GDPR Art. 15)

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



Correct your data	Ask us to fix anything wrong or out of date (Art. 16)
Delete your data	Ask us to delete your data and all Threadballs, Threads and Strands you control — the right to be forgotten (Art. 17) — note that records you added to someone else's Threadball remain with its owners (see Section 8)
Limit how we use it	Ask us to pause certain uses of your data while you raise a concern (Art. 18)
Take your data elsewhere	Receive a portable, machine-readable copy of your data including all Threadball exports (Art. 20)
Object to processing	Tell us to stop using your data for certain purposes, including legitimate interest processing (Art. 21)
Withdraw consent	Change your mind about any consent you have given us, at any time, without affecting prior processing (Art. 7(3))
Threadball subject rights	If you are the subject of a Threadball created by someone else, contact us to request access to, correction of, or deletion of your data
Not to be subject to automated decisions	You have the right not to be subject to a decision based solely on automated processing that produces a legal or similarly significant effect on you (Art. 22). LifeThreads does not currently carry out any solely automated decision-making of this kind. If this changes, we will update this policy and tell you before it takes effect.

How to exercise your rights

Email: privacy@lifethreads.co.uk

In-App: Settings > Privacy > My Data Rights We will respond within 30 days, free of charge. There is no charge for making a request. If you are not satisfied with our response, you have the right to complain to the UK Information Commissioner's Office (ICO) at ico.org.uk, or to your national data protection authority if you are based in the EU.

10. Rights of Threadball subjects

If someone has created a Threadball containing your personal data, you have rights even if you are not a LifeThreads user.

Contact us at privacy@lifethreads.co.uk if you believe a Threadball has been created about you without your consent, or if it contains inaccurate data about you. We will investigate and take action within 30 days, including restricting or deleting data where no lawful basis can be confirmed.

We will ordinarily notify the Threadball owner that a request has been made, as this is necessary for a fair investigation. However, we will not notify the Threadball owner where doing so could cause harm to you - for example, in cases involving domestic abuse, family estrangement, safeguarding concerns, or any other situation where notification could put your safety or wellbeing at risk. If you have concerns about notification when submitting your request, please tell us and we will take that into account.

11. Children's privacy

Privacy Policy

Last Updated: 7 September 2026 · Version 3.0



LifeThreads is not for children under 16 to use directly. We do not knowingly allow children under 16 to create their own accounts. Parents and legal guardians may create Threadballs for their children as described in Section 3.4. If you believe a child under 16 has created their own account, please email privacy@lifethreads.co.uk and we will delete it promptly.

12. Cookies and local storage

We use only the minimum cookies and local storage necessary to operate the app securely. This includes session authentication tokens, your encryption key reference, and your account preferences. We do not use advertising cookies, behavioural tracking technologies, or cross-app tracking. Full details are in our Cookie Policy, available at Settings > Privacy > Cookie Policy.

13. Changes to this policy

For significant changes we will notify you by email and with an in-app notice at least 30 days before the change takes effect. Previous versions are always accessible within the app and at lifethreads.co.uk/privacy.

If you do not wish to accept a significant change, you may export all your data and close your account at any time before the change takes effect - at no cost and without penalty. To export your data, go to Settings > Privacy > Export My Data. To close your account, go to Settings > Account > Delete Account.

If you continue to use LifeThreads after the change takes effect, we will take that as your acceptance of the updated policy. If you have any questions about a proposed change before deciding whether to accept it, contact us at privacy@lifethreads.co.uk and we will be happy to explain what has changed and why.

14. Contact us

- General enquiries: info@lifethreads.co.uk
- Privacy questions and data rights requests: privacy@lifethreads.co.uk
- General support: support@lifethreads.co.uk
- In the app: Settings > Help > Privacy

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