

## **Privacy Policy – www.wellertia.com**

Last updated: 07/05/2026

This Privacy Policy explains how Veritas Horizon Partners Ltd, trading as Wellertia (“Wellertia”, “we”, “us” or “our”), collects and uses personal data when you visit www.wellertia.com, submit an enquiry, upload dental files, contact us, or use our dental coordination and introduction service.

Wellertia is a dental coordination and introduction service. We help people considering dental treatment abroad explore Latvia as an option by collecting enquiry information, sharing relevant information with selected Latvian dental clinics where you consent, obtaining initial clinic feedback or indicative pricing where possible, and helping coordinate next steps.

We are the data controller for this website, for enquiries submitted to Wellertia, and for the coordination activity we perform.

### **1. Who we are**

Veritas Horizon Partners Ltd  
Registered in England and Wales, company number: 16410789  
Registered office: 3rd Floor, 86–90 Paul Street, London, EC2A 4NE, United Kingdom  
ICO registration number: ZB969627

Trading name: Wellertia  
Website: [www.wellertia.com](http://www.wellertia.com)  
Data Protection Contact: [hello@wellertia.com](mailto:hello@wellertia.com) / [enquiries@wellertia.com](mailto:enquiries@wellertia.com)

We have not appointed a Data Protection Officer. For privacy matters, contact us using the email addresses above.

### **2. Data protection laws we follow**

We are established in the United Kingdom and are primarily subject to the UK GDPR and the Data Protection Act 2018.

Where EU GDPR applies, for example because we offer services to individuals in the EEA, we apply equivalent data protection standards.

Separately, where we transfer personal data from the UK to Latvia or to service providers outside the UK, we apply the UK GDPR rules on international transfers.

Where we use cookies, analytics, advertising tags or similar technologies, we also apply applicable UK PECR rules.

### **3. Information we collect**

We collect the following categories of information.

#### A) Enquiry and contact information

When you submit an enquiry or contact us, we may collect:

- full name;
- email address;
- phone number;
- WhatsApp number or Telegram contact details, where provided;
- country of residence;
- treatment type or treatment interest;
- whether you already have a treatment plan;
- any message or free-text information you provide;
- preferred communication method;
- information about your availability, travel intentions or practical coordination needs;
- consent confirmations and form submission records.

#### B) Dental and health information

Because Wellertia helps coordinate dental enquiries, you may choose to provide dental or health-related information. This may include:

- dental concerns or treatment goals;
- dental history or previous treatment information;
- existing treatment plans;
- clinic quotations or correspondence;
- scans, X-rays, CT/CBCT files, photos, PDFs or other uploaded files;
- information contained in messages, emails, WhatsApp messages, Telegram messages or voice notes.

This information may include special category data under UK GDPR because it may reveal information about your health.

Please only provide information and files that are relevant to your dental enquiry. You should not send unrelated medical, financial, identity or personal documents unless we specifically ask for them.

You should only upload or send dental/health information if you are comfortable with Wellertia processing it for the purposes explained in this Privacy Policy.

#### C) Information about children or other people

We do not accept enquiries from children.

However, we may receive enquiries about children where the enquiry is submitted by a parent, legal guardian or another person with authority to make the enquiry.

If you submit information about a child or another person, you confirm that you have authority to provide that information to us and for us to use it as described in this Privacy Policy.

#### D) Communications information

If you communicate with us by email, WhatsApp, Telegram or other channels, we may collect and retain:

- the content of your messages;
- attachments and files you send;
- voice notes or audio messages you send through WhatsApp or Telegram;
- contact details used to communicate with us;
- dates and times of communications;
- notes of relevant communications.

We do not routinely record calls. If call recording is introduced later, we will provide notice and ask for consent where required.

#### E) Website, technical and usage data

When you browse the site, we may collect technical and usage data such as:

- IP address;
- browser type and version;
- device type and operating system;
- pages visited;
- interactions with the website;
- approximate location derived from IP address;
- referring URL;
- cookie identifiers and consent preferences.

#### F) Cookies, analytics and advertising data

We may use cookies and similar technologies for:

- essential website functionality and security;
- form operation and website performance;
- analytics, including Google Analytics 4 through Google Tag Manager;
- advertising measurement, including Google Ads and Meta/Facebook advertising tools, where enabled and consented.

See our Cookie Policy for more information.

### **4. How we collect information**

We collect information:

1. Directly from you, when you submit an enquiry form, upload files, email us, contact us through WhatsApp or Telegram, or otherwise communicate with us.
2. Automatically, when you browse the website, through cookies, analytics tools, advertising tags, technical logs and similar technologies.
3. From service providers, including form, hosting, email, analytics, advertising and storage providers.
4. From Latvian clinics or third-party providers, where they respond to an enquiry, provide initial feedback, provide indicative pricing, confirm availability, or communicate about your enquiry.

## **5. How we use your information**

We use personal data to:

- respond to your enquiry;
- understand the type of dental treatment you are exploring;
- communicate with you about your enquiry;
- receive, store and review information and files you submit;
- identify selected Latvian dental clinics that may be relevant to the type of treatment being explored;
- share relevant information and uploaded files with selected Latvian clinics where you have given consent;
- obtain initial clinic feedback, indicative pricing or possible next steps;
- help coordinate communications and practical next steps;
- help suggest or coordinate introductions to third-party providers for accommodation, airport pickup, transport or other practical arrangements where requested;
- manage email, WhatsApp and Telegram communications;
- operate, secure, test and improve the website;
- monitor website performance and usage;
- measure advertising effectiveness where consent has been given;
- send service-related communications;
- send marketing communications where you have given consent;
- keep records of enquiries, consent, communications and coordination activity;
- handle complaints, disputes or legal issues;
- comply with legal obligations and protect our legal rights.

## **6. Legal basis for processing**

We rely on different legal bases depending on the type of data and the purpose of processing.

### **A) Ordinary personal data**

For ordinary personal data, we rely on:

## 1. Contract / steps before contract

Where processing is necessary to respond to your enquiry, take steps at your request, provide coordination support, or perform any agreed service.

## 2. Legitimate interests

Where processing is necessary for our legitimate interests in operating a dental coordination service, communicating with users, managing enquiries, improving the website, keeping appropriate business records, protecting the security of our systems, and establishing or defending legal claims.

We only rely on legitimate interests where we consider that our interests are not overridden by your rights and freedoms.

## 3. Consent

Where you consent to optional marketing communications, non-essential cookies, analytics cookies, advertising cookies, or other consent-based processing.

## 4. Legal obligation

Where processing is necessary for us to comply with legal, tax, accounting, regulatory or data protection obligations.

## B) Dental/health information and uploaded files

Dental and health information may be special category data under UK GDPR.

Where we process dental/health information and uploaded files for the purpose of reviewing your enquiry, sharing relevant information with selected Latvian clinics, obtaining clinic feedback or indicative pricing, and coordinating next steps, we rely on your explicit consent for special category data.

You may withdraw your consent at any time by contacting us. If you withdraw consent, we may not be able to continue progressing your enquiry. Withdrawal of consent does not affect processing that took place before consent was withdrawn.

Where necessary, we may also process or retain limited health-related information for the establishment, exercise or defence of legal claims.

## **7. Explicit consent for dental/health information**

Because dental enquiries may include health information and uploaded dental files, our enquiry form asks you to provide explicit consent before submitting dental/health information or uploaded files.

Our enquiry form asks you to confirm:

“I explicitly consent to Wellertia processing my dental/health information and uploaded files, and sharing relevant details with selected Latvian clinics, to review my enquiry and coordinate next steps.”

This consent covers the dental and health information you choose to provide, including scans, X-rays, CT/CBCT files, photos, treatment plans, messages and related dental information.

You are not required to upload files, but without sufficient information a clinic may be unable to provide meaningful initial feedback or indicative pricing.

## **8. Sharing information with Latvian clinics**

To progress your enquiry, we may share relevant enquiry details and uploaded files with selected dental clinics in Latvia.

This is done so that clinics can review the case at an initial level, provide feedback, indicate whether the case may be suitable for them, provide indicative pricing, or explain possible next steps.

Latvian clinics are independent third parties. Once a clinic receives your information for its own clinical review, patient onboarding, treatment planning, pricing or treatment relationship, that clinic may process your information as an independent controller under its own privacy terms and professional obligations.

Wellertia is not responsible for the clinic's own privacy practices. You should review the clinic's privacy information when you engage with that clinic directly.

## **9. Other data sharing and disclosure**

We do not sell your personal data.

We may share personal data with the following categories of recipients:

### **A) Service providers**

We use service providers to operate the website, forms, communications, file storage, analytics and marketing tools. These may include:

- Cloudflare, including Cloudflare R2 for uploaded file storage and Cloudflare website/security services;
- Formspree for form handling and storage;
- Zoho and Gmail for email handling;
- Vercel for website hosting, deployment or related website infrastructure;
- Google, including Google Analytics 4, Google Tag Manager and Google Ads;
- Meta/Facebook advertising tools;

- other technical providers that support website operation, security, storage, communications or analytics.

Form submissions may be stored in Formspree and sent to Zoho/Gmail. Uploaded files may be stored in Cloudflare R2.

#### B) Communication platforms

If you choose to contact us through WhatsApp Business or Telegram, your communications will also be processed through those third-party platforms, subject to their own terms and privacy practices.

#### C) Latvian dental clinics

We may share relevant enquiry information and uploaded files with selected Latvian dental clinics as explained above.

#### D) Third-party practical support providers

Where requested, we may share relevant contact or coordination information with third-party providers involved in accommodation, airport pickup, transport or other practical arrangements.

#### E) Professional advisers

We may share information with lawyers, accountants, insurers or other professional advisers where necessary.

#### F) Authorities and legal recipients

We may share information where required by law, court order, regulator, public authority, or where necessary to establish, exercise or defend legal claims.

#### G) Business transfers

If we sell, restructure or transfer part of our business, personal data may be shared with relevant parties under appropriate confidentiality and data protection safeguards.

### **10. Referral fees and commercial transparency**

Wellertia may receive referral, introduction, coordination, success or other commercial fees from clinics or third-party providers if your enquiry results in treatment, a booking or another arrangement.

This does not change how we use your personal data. We disclose this because it is part of the commercial model of the service.

### **11. International data transfers**

Wellertia is based in the United Kingdom.

We may transfer personal data from the United Kingdom to Latvia when sharing enquiry details or uploaded files with selected Latvian clinics. Latvia is in the EEA. UK adequacy arrangements allow personal data to flow from the UK to EEA countries without additional transfer safeguards where adequacy applies.

Some of our technology providers may process or access personal data outside the United Kingdom or EEA. This may include providers involved in hosting, file storage, form handling, email delivery, analytics, advertising, website security, WhatsApp, Telegram or other communications infrastructure.

Where personal data is transferred outside the United Kingdom or EEA, we rely on appropriate transfer mechanisms where required. These may include:

- UK adequacy regulations;
- the UK International Data Transfer Agreement;
- the UK Addendum to the EU Standard Contractual Clauses;
- EU Standard Contractual Clauses;
- provider data processing terms where they incorporate legally recognised transfer safeguards, such as Standard Contractual Clauses, the UK Addendum or the UK International Data Transfer Agreement;
- other legally recognised transfer safeguards.

We take a proportionate approach to international transfers based on the nature of the service, the provider used, the type of data involved and the safeguards made available by the relevant provider.

## **12. Data retention**

We keep personal data only for as long as needed for the purposes described in this Privacy Policy.

We apply different retention periods depending on the type of data, the status of the enquiry, and whether the information is needed for service, legal, complaint, tax, accounting or business-record purposes.

As a guide:

### **A) Inactive or unsuccessful enquiries**

If an enquiry does not progress, becomes inactive, or is unsuccessful, we normally delete or anonymise the core enquiry record within 6 months from the last meaningful contact.

### **B) Uploaded dental/health files for inactive or unsuccessful enquiries**

Uploaded dental/health files for inactive or unsuccessful enquiries, including scans, X-rays, CT/CBCT files, photos, treatment plans, PDFs and similar clinical files, are normally deleted within 6 months from the last meaningful contact.

#### C) Communications for inactive or unsuccessful enquiries

For inactive or unsuccessful enquiries, related email, WhatsApp and Telegram communications will normally be deleted or anonymised within 6 months from the last meaningful contact, unless they are needed for a complaint, dispute, legal claim, compliance issue or other legitimate reason.

#### D) Active enquiries

Where an enquiry remains active, we retain relevant enquiry information, communications and uploaded files for as long as reasonably needed to manage the enquiry and coordinate next steps.

#### E) Completed introductions or coordination records

Where an enquiry results in a completed introduction, clinic referral, coordination activity, booking or other substantive outcome, we may retain core enquiry and coordination records for up to 2 years from the last substantive coordination activity.

This may include the basic enquiry record, clinic introduced, date of introduction, communication history, consent record, referral status, and relevant coordination notes.

#### F) Uploaded dental/health files for completed introductions

Uploaded dental/health files for completed introductions are normally deleted within 12 months from the last substantive coordination activity, unless they are needed for a complaint, dispute, legal claim, regulatory issue or another legitimate reason.

Where possible, we keep the core coordination record without retaining unnecessary clinical files for longer than needed.

#### G) Communications for completed introductions or substantive coordination activity

For completed introductions or substantive coordination activity, relevant email, WhatsApp and Telegram communications may be retained for up to 2 years.

Where those communications contain uploaded dental/health files, we will seek to delete or reduce those files in line with the dental/health file retention periods above where practicable.

#### H) Consent records

We may retain records of consent for as long as reasonably needed to evidence consent, respond to complaints, deal with legal issues, or demonstrate compliance.

Consent records may include timestamp, checkbox values, consent wording/version, Privacy Policy version, Terms and Conditions version, IP address where available, and browser/user-agent information where available.

#### I) Marketing contacts

Where you consent to marketing communications, we retain marketing contact details until you unsubscribe or ask us to delete them.

We may retain a minimal suppression record after unsubscribe so that we do not contact you again by mistake.

#### J) Technical logs, analytics and advertising data

Technical logs, analytics data and advertising data are retained according to provider settings and industry-standard periods.

Where possible, analytics and advertising data will be aggregated or pseudonymised.

#### K) Accounting, tax and commercial records

Where we receive referral, introduction, coordination, success or other commercial fees from clinics or third-party providers, we may retain related business, invoice, accounting and tax records for the period required by law.

Where possible, those records will avoid unnecessary dental/health detail.

#### L) Longer retention

We may retain limited information for longer where necessary to:

- establish, exercise or defend legal claims;
- comply with legal, tax, accounting or regulatory obligations;
- handle complaints or disputes;
- maintain business records;
- protect the security and integrity of our service;
- evidence consent or the history of an enquiry.

When data is no longer needed, we will delete, anonymise or minimise it where reasonably practicable.

### **13. Marketing communications**

We only send marketing communications where you have given consent.

If we ask for marketing consent, the marketing checkbox will be optional and separate from the consent needed to process your dental/health enquiry.

You can unsubscribe from marketing communications at any time by using the unsubscribe link, replying to the message, or contacting us at [hello@wellertia.com](mailto:hello@wellertia.com) or [enquiries@wellertia.com](mailto:enquiries@wellertia.com).

Service-related communications about your enquiry are not marketing and may still be sent where necessary to respond to or manage your enquiry.

#### **14. Cookies and similar technologies**

We use cookies and similar technologies for website functionality, security, analytics and advertising measurement.

Essential cookies are used to make the website work and keep it secure.

Analytics cookies, advertising cookies and similar non-essential technologies are used only where consent is required and has been given through the cookie banner.

Our Cookie Policy explains the cookies and similar technologies we use and how you can manage your choices.

You can change your cookie preferences through the cookie banner or the “Cookie settings” link on the website.

#### **15. Security measures**

We use reputable service providers and take reasonable technical and organisational measures to protect personal data.

These measures may include:

- restricting access to enquiry information and uploaded files;
- using need-to-know access controls;
- using secure hosting, storage and website security providers;
- limiting internal access to authorised personnel;
- using provider security features where available;
- maintaining appropriate organisational controls over enquiry handling.

No system is completely secure, and we cannot guarantee absolute security. However, we take proportionate steps to reduce the risk of unauthorised access, loss, misuse or disclosure.

#### **16. Your rights**

Depending on your location and the circumstances, you may have the right to:

- access your personal data;
- correct inaccurate or incomplete data;

- request deletion of your data;
- restrict processing;
- object to processing based on legitimate interests;
- request data portability in certain circumstances;
- withdraw consent where processing is based on consent;
- complain to a supervisory authority.

To exercise your rights, contact us at:

hello@wellertia.com  
enquiries@wellertia.com

We may need to verify your identity before responding to a rights request.

Some rights are subject to legal limits. For example, we may need to retain limited information where necessary for legal claims, compliance, complaints, accounting, or to maintain a suppression record.

## **17. Withdrawing consent**

Where we rely on your consent, including explicit consent for dental/health information, you may withdraw consent at any time by contacting us.

If you withdraw consent for dental/health processing, we may no longer be able to continue your enquiry or share information with clinics.

Withdrawal of consent does not affect the lawfulness of processing carried out before consent was withdrawn.

## **18. Children's privacy**

Our website and services are intended for adults.

We do not accept enquiries submitted by children.

We may accept enquiries about children only where submitted by a parent, legal guardian or another person with authority to make the enquiry.

If we become aware that a child has submitted personal data directly without appropriate authority, we will take reasonable steps to delete it.

## **19. WhatsApp and Telegram**

If you contact us through WhatsApp or Telegram, your communications will be processed through those third-party platforms.

Those platforms have their own terms and privacy practices. You should consider this before sending sensitive information through WhatsApp or Telegram.

Where you send dental/health information, photos, scans, treatment plans, voice notes or other files through WhatsApp or Telegram, we may use that information to respond to your enquiry and coordinate next steps in the same way as information submitted through the website.

## **20. Automated decision-making**

Wellertia does not make solely automated decisions that produce legal or similarly significant effects for users.

We may use analytics and advertising tools to understand website usage and measure advertising performance, but we do not use those tools to make clinical, eligibility or treatment decisions.

## **21. Third-party links and services**

Our website may contain links to third-party websites, platforms or services, including clinics, WhatsApp, Telegram, Google, Meta/Facebook or other providers.

We are not responsible for the privacy practices, terms or content of third-party websites or platforms.

Please review the relevant third-party privacy information before using those services or providing personal data to them.

## **22. Complaints**

If you have concerns about how we use your personal data, please contact us first so we can try to resolve the issue.

You can also complain to the UK supervisory authority:

Information Commissioner's Office (ICO)  
Website: [www.ico.org.uk](http://www.ico.org.uk)

If you are located in the EU, you may also have the right to complain to your local data protection supervisory authority.

## **23. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time.

The latest version will be posted on the website with a new "Last updated" date.

If we make material changes to how we process personal data, we will take reasonable steps to bring those changes to your attention where appropriate.

## **24. Contact**

For privacy questions, rights requests or data protection concerns, contact:

Veritas Horizon Partners Ltd trading as Wellertia  
3rd Floor, 86–90 Paul Street  
London  
EC2A 4NE  
United Kingdom

Email:

[hello@wellertia.com](mailto:hello@wellertia.com)

[enquiries@wellertia.com](mailto:enquiries@wellertia.com)

Website:

[www.wellertia.com](http://www.wellertia.com)