



Privacy policy – Geras Solutions

1. Introduction

- 1.1 We are committed to safeguarding the privacy of Geras Solutions' (GS) users.
- 1.2 Geras Solutions acts as both the processor and the controller of the users' data, i.e. it is both the entity that determines the purpose and means of the processing of the personal data, as well as the entity processing the data. As such this policy applies where we are acting as both controller and processor.
- 1.3 Users will have to consent to the use of cookies. We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website. Users will need to give clear consent to our use of cookies by clicking "Okay, Thanks", after reading a pop-up message informing them of our use of cookies and are given the chance to read more in detail about our cookie policy. We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>
- 1.4 In this policy, "we", "us" and "our" refer to GS. [For more information about us, see Section 7.].
- 1.5 In this policy, "your", "user" and "customer" refers to GS' customer based and users.

2. How we use your personal data:

- 2.1 In this section we clarify:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal basis of the processing.
- 2.2 We may process data regarding users' use of our website and app ("**usage data**"). The usage data may include IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics. This usage data may be processed to analyze where our visitors and users come from and how engaged they are in our services. Basis for processing and analyzing this type of data is **user consent**, and we require the users' data to be able to provide an overall better and smoother experience to our users regardless of their location or used device.
- 2.3 We may process users' account data ("**account data**"). The account data may include users' name, email address, age, gender, language. The source of the account data is the user him/herself. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with the user. Basis for processing and analyzing this type of data is **user consent**. The reason for this is providing our dementia certified specialists with easily identifiable details when analyzing cognitive test results in our back-office, and successively connecting with the user to communicate the results of those tests.

- 2.4 We may process users' personal data that are provided in the course of the use of our services, i.e. during the "initial questionnaire", "medical history", and "cognitive test" sections of the app ("**service data**"). The service data may include information regarding subjective symptoms, pre-existing conditions, or changes in health or behavior noticed by others. The source of the service data is the user him/herself. The service data may be processed for 2 reasons: 1) to aid the clinician in his/her assessment and; 2) to contribute to the development of a machine learning solution, i.e. thanks to the data provided by the users, GS will develop an algorithm which will greatly aid clinicians in their diagnosis and sensibly lower the cost of a single dementia diagnosis. Processing service data is thus necessary to provide the users with an accurate clinical assessment as well as taking steps to the future developments of GS' services. Basis for processing and analyzing this type of data is **user consent**.
- 2.5 We may process information relating to transactions between the users and GS, when they purchase our services ("**transaction data**"). The transaction data may include users' contact and any transaction details provided to engage in financial payment or subscription. The transaction data may be processed for keeping proper records of those transactions and comply with financial regulations. This is necessary to ensure proper administration of our website, app and business. Basis for processing and analyzing this type of data is **user consent**.
- 2.6 We may process information contained in or relating to any communication that users send us ("**correspondence data**"). The correspondence data may typically include the communication content and source of the message, i.e. e-mail address or phone number. The correspondence data may be processed for the purposes of communicating with users and record-keeping. This is necessary for proper communication with our existing as well as potential users that pose questions to GS. Basis for processing and analyzing this type of data is **user consent**.
- 2.7 In addition to what is written above, we may process any type of personal data in our possession and hand it over, if required to do so by a regulator or court of law after receiving a warrant or legal equivalent.
- 2.8 Users are not allowed to provide any data pertaining to another person without full consent of the 1st party. E.g. a 2nd party entering data via another a 1st parties' mobile phone or computer, without consent. Consent must always be obtained by the 1st party, or owner of private information, which are provided to GS.
- 2.9 GS needs to retain and process users' personal data if is to function correctly. This is the reason and basis for us to retain the personal data in question. Users are clearly asked to consent to the collection and processing of their personal data the first time they use the app, and they need to consent to it in order to use the app.
- 2.10 Lawful basis for the processing of the users' personal data is their consent, as defined by GDPR regulation. This means that users have total control over their data and are at any time allowed to prevent it from being processed.

3. Providing your personal data to others

- 3.1 Financial transactions relating to our services are handled by our payment service provider. We will share transaction data with our payment service providers only to the extent necessary for the purposes of complying with financial regulation and payment.
- 3.2 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data when legally obliged to or when vital interests of a third person are involved.

4. Retaining and deleting personal data

- 4.1 This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall be kept for as long as necessary, in accordance with GDPR regulation.

- 4.3 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria. It is important for the users to understand that their data is not going to be used for any commercial or advertisement purposes but is going to contribute to the creation of an algorithm that will be able to safely and non-invasively detect dementia. The algorithm by definition is reliant on a large quantity of data and that is the reason why users' data will be retained for as long as necessary, i.e. until the algorithm will be developed and will have enough data to complete its task.
5. In addition to what stated above, we may retain users' data when needing to comply to any form of rule and legislation.
6. Geras Solutions does not store any of the users' passwords, meaning that user profiles are accessible only by the users themselves. At the same time, we also use a VPN tunnel for our authentication, which specifically provides an extra layer of security for our database servers replica set.
7. Geras Solution believes that user data should always be protected and for this reason it resorts to data encryption. Encryption refers to the method by which plaintext or any other type of data is converted from a readable form to an encoded version that can only be decoded by another entity if they have access to a decryption key. Encryption is one of the most important methods for providing data security.

8. Amendments

- 8.1 This policy may be updated from time to time by publishing a new version on our website.
- 8.2 Users are encouraged to check our website privacy policy page occasionally to ensure they understand and agree with any updates.
- 8.3 We will also notify users of changes to this policy by email and in certain cases by communication via our social media channels.

9. Users' rights

- 9.1 In this section we have summarized the rights that users are entitled to according to GDPR regulation. For a complete version of the regulation, users are welcome to follow this link: <https://www.eugdpr.org/>
- 9.2 Your principal rights under GDPR are:
 - (a) the right to be informed: users have the right to understand who is collecting their data and for which purpose, through an explicit information;
 - (b) the right to rectification: users can request to rectify or complement inaccurate data. The data asked to be rectified will be so within one month;
 - (c) the right to erasure ("right to be forgotten"): users are entitled to require their data to be erased (provided certain grounds apply, e.g. data retention is no longer necessary). The data asked to be erased will be so within one month;
 - (d) the right to be notified of processing: users have the right to be notified of any processing activities involving their personal data;
 - (e) the right to object to processing: users have the right to object to processing activities or their personal data;
 - (f) the right to data portability: users have the right to demand a copy of their private data maintained by GS. The data will be provided in a commonly used format, without any cost for the user;
 - (g) the right to complain to a supervisory authority;

- (h) the right to withdraw consent: the users have the right to withdraw their consent to the processing of their data at any time, provided certain grounds apply.

10. Our details

10.1 This website is owned and operated by Geras Solution AB.

10.2 We are registered in Sweden under registration number (16) 559025-3828, and our registered office is at Gyllenstiernsgatan 12, 115 26, Stockholm, Sweden.

10.3 You can contact us:

- 1) by post, to the postal address given above;
- 2) using our website contact form or via support@gerassolutions.com

11. Data protection officer

11.1 Contact detail for our person responsible for data related questions is: haza.newman@gerassolutions.com

Datum: 14/04/2019