



## Opatus Privacy Policy

### Processing of personal data

On this day, 2018-05-21, the following policy has been established for Opatus AB.

### Purpose

We protect your privacy. You should be able to feel secure when you entrust us with your personal information. That is why we have established this policy. It is based on current data protection legislation and clarifies how we work to protect your rights and your privacy.

The purpose of this policy is to let you know how we process your personal information, what we use it for, who can access it and under what conditions, and how you can exercise your rights.

### Background

We process your personal information primarily to fulfil our obligations to you. Our starting point is not to process more personal information than is necessary for the purpose, and we always strive to use the least privacy-sensitive information.

We also need your personal data to provide you with good service, for example in terms of marketing, follow-up and information. We may also need your personal information to comply with laws and to perform customer and market analyses.

You have the right to oppose us using personal data for direct marketing purposes. When we collect personal information about you for the first time, you get more information about this through a consent form and how you can oppose it.

### Guidelines customer data

#### *What personal information do we process?*

We only process personal data when we have legal grounds. We do not process personal data other than when they are needed to fulfil obligations under contract and law. Here are some examples of the personal data we process:

- Name
- Address
- E-mail address
- Phone
- Title
- Information that the person self-registered and voluntarily stated
- Content that person publishes themselves, so-called user-generated content
- Information on customer relations, history of purchase etc. and invoicing information.

According to GDPR rules, you can always request to see all information Opatus has stored about you. Opatus will provide this within 30 workdays. You may also request that all data

about you should be deleted. Opatus will only keep data that is required by law, e.g. tax regulations.

Customer data is stored as a cloud-based CRM (HubSpot, see separate document)

## Guidelines patient data

### *What personal information do we process?*

We only process patient data when we have legal grounds. We do not process patient data other than when they are needed to fulfil obligations to you as a professional healthcare.

Here are some examples of the personal data we process:

- Patient ID number of your choice. Please do not use name, social security number or any public ID. An internal Patient ID used at your clinic is preferable.
- Sex (needed to compare results to the results of a normative group)
- Birth date. (needed to compare results to the results of a normative group)
- Test measurements in binary format such as reaction time, reaction time variation, movement pattern, number of errors and type of errors.
- Medication, dose and time since given if filled in by you
- Diagnoses if filled in by you

Test data, including patient data, is transferred vi https (encrypted transmission) between the measuring devices (iPhone/iPod) and Opatus Server. The server is cloud-based the service is provided by CityNetwork which is a professional provider with high standards. See a separate document on Certificates etc. for CityNetwork.

### *How do we access your personal information?*

We try as far as possible to obtain your consent before we begin processing your personal data. You agree to the treatment by accepting our terms and conditions. When you agree to our terms and conditions, you also agree that we process your personal data.

You have the right to revoke your consent at any time. We will then no longer process your personal data or obtain new ones, provided that it is not necessary to fulfil our obligations under contract or law. Keep in mind that revocation of consent may mean that we are unable to fulfil our obligations to you.

We also access your personal information in the following ways:

- Information that you provide us directly
- Information we receive from public records
- Information we receive when you hire one of our employees
- Information we receive when you register for our courses or seminars
- Information we receive when you sign up for newsletters and other mailings
- Information we receive when responding to surveys and surveys
- Information we receive when you contact us, apply for employment with us, visit us or otherwise contact us

### *What information do we give you?*

When we collect your personal data for the first time, we will inform you about how we have obtained the personal data, what we will use it for, what rights you have under the data protection legislation and how you can use it. You will also be informed about who is responsible for the processing of personal data and how you can contact us if you have questions or need to submit a request or request relating to your personal data and / or rights.

*Is your personal data processed in a satisfactory manner?*

We work out procedures and procedures to ensure that your personal data is handled in a secure manner. The starting point is that only employees and other persons within the organization who need the personal data to perform their tasks should have access to them.

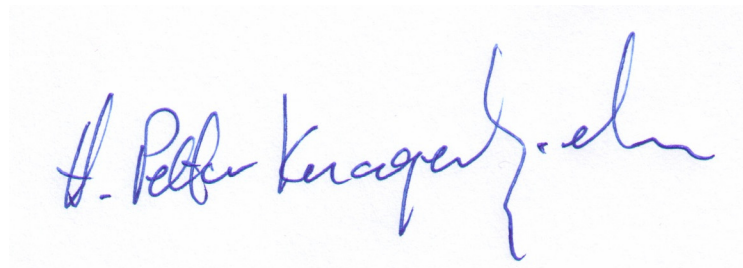
Our systems are adapted to the new GDPR regulations and are developed with your integrity in focus and to a very high degree protect against intrusion, destruction and other changes that may pose a risk to your privacy.

We do not transfer personal data in cases other than those expressly stated in this policy.

*When do we disclose your personal information?*

Our starting point is not to disclose your personal information to third parties unless you have consented to it or if it is not necessary to fulfil our obligations under contract or law. In cases where we disclose personal data to third parties, we establish confidentiality agreements and ensure that personal data is processed in a satisfactory manner.

Pixbo 21/5-2018



Petter Knagenhjelm

Opatus AB  
Kullavägen 18B  
43543 Pixbo, Sweden