



Privacy Policy

Processing of personal data

On this day, 2021-03-01, the following policy has been established for Opatus AB.

By Opatus, “we” or “us”, we refer to our website at (the “Site”), and all related websites, downloadable software, mobile applications such as the Opatus CPTA app, and other services provided by us and on which a link to this privacy policy is displayed. Furthermore, all other communications with individuals through written or oral means, such as Email, Web-meetings or phone. All activities above are referred to as our “Service”

The short version

The text below may seem somewhat lengthy and rigorous, but all we want to say is:

- We process data to fulfil our obligations to our customers and law
- We handle as little data as possible
- We never share personal data with others unless explicitly told to do so by you
- You can ask us what we have saved, correct mistakes, and/or request to delete data
- You can complain if want, just [contact](#) us
- All data is stored in Sweden
- We will do our best to protect your data and keep it safe.

Purpose

We protect your privacy. Anyone should feel secure entrusting us with 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 issuing 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. This policy applies indistinctly and generally to any patient and healthcare professional using the Service (collectively “Users”).

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.

Collection of Information

We collect different types of information from or through the Service. The legal bases for our processing of personal information are primarily that the processing is necessary for providing the Service and/or healthcare services to you and that the processing is carried out in our legitimate interests, which are further explained in the "[Use of Information](#)" section. We may also process personal information upon your consent, asking for it as appropriate.

Opatus customer data

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)

Patient data we receive as data processor¹

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

Automatically Collected Information

When you use the Service, we may automatically record certain information from your device by using various types of technology, including cookies or "web beacons." This automatically collected information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Service, the pages or other content you view or interact with on the Service, and the dates and times of the visit, access, or use of the Service. We also may use these

¹ Note that Opatus normally do not have name or personal identification numbers (e.g. social security number) to patients. Patients are assigned with a patient id generated by the treating healthcare professional.

technologies to collect information regarding your interaction with email messages, such as whether you open, click on, or forward a message. You may limit the automatic collection of certain information by our Service, for instance by disabling the cookies using your browser options. Please be aware that by doing so it may prevent you from using specific features on our Service, such as maintaining an online account. We use automatically collected information and other information collected on the Service through cookies and similar technologies to: (i) personalize our Service, such as remembering your information so that you will not have to re-enter it during a visit or on subsequent visits; (ii) provide customised advertisements, content, and information; (iii) monitor and analyse the effectiveness of Service and third party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track your entries, submissions, and status in any promotions or other activities on the Service.

Data transfer

Test data, including patient data, is transferred via https (encrypted transmission) between the measuring devices (iPhone/iPod) and Opatas 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.

Besides Information that you provide us directly, we may also access your personal information from information we receive:

- from public records
- when you register for our courses or seminars or responding to surveys
- when you sign up for newsletters and other mailings
- when you contact us, apply for employment with us, visit us or otherwise contact us

Is your personal data processed in a satisfactory manner?

We follow 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 [GDPR](#) regulations (EU 2016/679) and the [Privacy Principles](#) of OECD 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 needed 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.

Use of Information

We take steps designed to ensure that only those employees who need access to your personal information to fulfil their employment duties will have access to it.

We use the information that we collect in a variety of ways in providing the Services and operating our business, including:

- To operate, maintain, enhance and provide all features of the Service (including research and development purposes), to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service.
- to understand and analyse the usage trends and preferences of our users, to improve the Service, and to develop new products, services, feature, and functionality.
- To send you communications in compliance with applicable laws; or
- To comply with legal and regulatory requirements, where applicable.

Security and Retention

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate physical, technical and administrative safeguards to protect personal information against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse, and any other unlawful form of processing of the personal information in our possession. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or administrative safeguards. If you believe your personal information has been compromised, please contact us outlined in the "[Contact Us](#)" section. If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law. We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this policy and in order to comply with our legal and regulatory obligations. If you would like further information regarding the periods for which your personal information will be kept, please [contact](#) us.

Third-Party Services

Our Service may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

Rights Regarding personal information

On written request and subject to proof of identity, you may access the personal information that we hold, used or communicated and ask that any necessary corrections be made, where applicable, as authorised or required by law. However, to make sure that the

personal information we maintain about you is accurate and up to date, please inform us immediately of any change in your personal information by postal service or e-mail.

Additional Rights for Europeans Users

Please note that the term personal information used in this policy is equivalent to the term “personal data” under the GDPR and other applicable European data protection laws. Under the GDPR, you may be entitled to additional rights, including: (i) the right to withdraw consent to processing where consent is the basis of processing; (ii) the right to access your personal information and certain other supplementary information, under certain conditions; (iii) the right to object to unlawful data processing, under certain conditions; (iv) the right to erasure of personal information about you, under certain conditions; (v) the right to demand that we restrict processing of your personal information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, processing is no longer necessary, or believe your personal information is inaccurate; (vi) the right to data portability of personal data concerning you that you provided us in a structured, commonly used, and machine-readable format, under certain conditions; (vii) the right object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you, under certain conditions; (viii) the right to lodge a complaint with data protection authorities. If you want to learn more about your rights under the GDPR, you can visit the [European Commission's page on Data Protection](#).

Contact us

You may exercise your rights by contacting us. If you are an individual (a patient), please note that we will be processing your personal data as a **data processor** on behalf of a **data controller**.

The **data controller** will be the professional health care provider using the Opatus CPTA application. You will need to review the contents of the data controller's privacy policy in respect of the processing of this personal data. We have data processing agreements in place with all the relevant data controllers.

If you have any questions or comments about this policy or your personal information, to make an access or correction request, to exercise any applicable rights, to make a complaint, or to obtain information about our policies and practices, our data protection officer can be reached by post or email using the following contact information below:

A handwritten signature in blue ink, appearing to read 'Petter Knagenhjelm', with a stylized flourish at the end.

Petter Knagenhjelm, CEO and data protection officer

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