



## Q1.6 Privacy Policy

*NOTE: This Privacy Policy is only applicable for users of the Q1.6 App.*

Please read our Privacy Policy carefully as it explains the following:

- What personal information is collected from you and for which purpose;
- The measures to safeguard the access to and the security of your Personal Data;
- Your rights of access of your Personal Data, right to rectification and erasure, right to object to data processing, right to lodge a complaint and right to data portability.

In order to use the Product, you must first acknowledge and agree to our Privacy Policy. You cannot use the Product without first accepting our Privacy Policy. You can agree to our Privacy Policy by ticking the “I agree” checkbox.

### 1. General

Q1.6 recognizes and understands the importance of the privacy of its users and wants to respect their desire to store and access personal information in a private and secure manner. This Privacy Policy applies to our Application and Platform and describes how Q1.6 manages, stores and utilizes your Personal Data.

Q1.6 is committed to protecting the privacy of all of its Users' Personal Data and providing a secure, user-controlled environment for the use of the Products. Being a Belgian company, we process personal data of Users based in the European Union strictly in accordance with the General Data Protection Regulation (GDPR). Whenever possible, we work with anonymized data [users are provided with activation codes by our Client or a Third Party contracted by the Client]. That means our company does not hold the keys to identify end users (we do not know who you are). On request of the Clients, we can change the degree of privacy and ask for more personal data, if necessary for the project. In that case we ask specific consent of the End-User and inform them about the purpose.

### 2. Definitions

All definitions mentioned in our Agreement also apply to this Privacy Policy.

Furthermore, the following definitions will have the following meaning:

“Agreement” means Agreement between Q1.6 and the customer;

“Client” means our customer, the person or institution through which you were provided with our product. This will usually be your employer or a health-care professional;



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“Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

“(Data) Processor: is a person or organization who deals with personal data as instructed by a controller for specific purposes and services offered to the controller.”

“Personal Data” means any information relating to a person (‘data subject’) on the basis of which that person can be identified;

"Product" means the complete Q1.6 Platform, including the Q1.6 App and the Web based Dashboard;

“Special Category of Personal Data” means more sensitive type of personal data, like information about your health;

“Supplier” means a contracted service provider who helps us to provide, understand and improve our Product.

“Third Parties” means any natural or legal person contracted by the Client to process data;

“User” means the end-user of the product (“you”).

### 3. Personal Data (including special category of personal data) that will be collected

We collect several types of Personal Data from the user and store it on your mobile device and our servers located in the European Union. This personal data may include:

- contact information (your name, postal address, e-mail address, and mobile or other telephone number);
- profile data provided on your account by you or the client (e.g. patient number, date of operation, employee number, start date);
- Information in helpdesk support inquiries;
- Information provided by you while using the Application, in particular in answering the questionnaire of the Client; this information may include Special Category of Personal Data, like information about your health conditions (such as a pain intensity score) and other health-related information;
- Device identifier and operating system version;
- Web behavior information such as information related to how you use the Application (e.g. browser type) collected through cookies and other automated technology. This only applies when using a web application such as using the



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(doctor's) dashboard or being linked through the Q App to a web page to view a video, for example)

### 4. How your Personal Data are processed – purpose and legal reasons of the processing

The main legal reason for processing your data is your consent and your agreement to our Terms of Use. The purposes we process your data are the following:

- Creating and managing your Account to use the Application;
- Allowing the Users and the Client access to the Application, their Account and the User Content;
- User management;
- To enforce the Q1.6 Terms of Use or Privacy Policy;
- Diagnosing technical problems and managing technical support and processing inquiries concerning the Application;
- The operation, evaluation and improvement of the Product;
- Market research and statistical research

Otherwise, we may need to process your data due to other legal obligations:

- In order to be in compliance with any applicable legislation or regulations;
- On request of a law enforcement authority or other government official;
- In case of an investigation of any suspected or actual fraudulent or illegal activity;
- In order to protect your or our safety and/or rights.

By agreeing with our Privacy Policy (ticking the box before accessing the Q1.6 App), you acknowledge and explicitly agree that we disclose your Personal Data, including Special Category of Personal Data concerning your health or your working environment, to the Client or a Third Party contracted by the Client by providing them with access to your personal profile and your User Content through the Q1.6 Platform and Dashboard.

You understand and agree that the technical processing and transmission of the Application, including your Personal Data, may involve (i) transmissions over various networks; and (ii) modifications to conform and adapt to technical requirements of connecting networks, or devices.

### 5. Children

Our Product is sometimes used by children, if this is recommended by our Client or a Third Party. At what age children are able to consent themselves depends on a national law. In



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case children are below the age at which they can give consent, their legal guardian must consent to the processing.

### 6. Security

Q1.6 shall take appropriate technical and organizational measures against unauthorized or unlawful processing of the Personal Data or its accidental loss, destruction or damage in the same way as it may be expected from a reasonably prudent controller.

### 7. Disclosure to Suppliers

Other than as set out in this Privacy Policy, we shall not sell or otherwise disclose your Personal Data to Third Parties without obtaining your prior explicit consent unless this is necessary for the purposes set out in this Privacy Policy or unless we are required to do so by law.

We may share Personal Data with Suppliers of Q1.6 (e.g. service providers who help us to provide, understand and improve our Product), with whom we signed agreements on data processing. We do not authorize these Suppliers to use or disclose your Personal Data except as strictly necessary to perform any services under our supervision or to comply with applicable legislation. We seek to provide any such Suppliers with only the Personal Data they need to perform their specific function.

In any event, such Suppliers shall be obliged to treat your Personal Data in accordance with this Privacy Policy. What is more, as an ISO 27001 certified company we have implemented an Information Security Management System to make sure our processes are secure.

### 8. Your rights

#### **Right of access**

If you are concerned or have any questions about your Personal Data, you have the right to request access to the Personal Data which we hold or process about you. We will then provide you with information about data being processed and on the source of this data.

#### **Right to rectification and right to erasure**

You have the right to request us free of charge to correct, erase or block any inaccuracies in your Personal Data, if such data would be incomplete, inaccurate or processed unlawfully. We will also notify about your decision our Suppliers, who consequently will respond to your request.



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Please note that you can change your account information in the Application at any time by sending an e-mail to [info@q16.ai](mailto:info@q16.ai)

### **Right to object to data processing**

You may withdraw at any time your consent to the processing of your Personal Data by Q1.6 by sending an e-mail to: [info@q16.ai](mailto:info@q16.ai) .

### **Right to lodge a complaint**

We are doing our best to always live up to a high data protection standard. If you are ever dissatisfied with the way we process your personal data, please contact us so that we can solve the issue. Should we be unable to come to a solution, you have the right to lodge a complaint with the supervisory authority. Here you can find a list of Data Protection Authorities for the countries based in the EU: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

### **Right to data portability**

You may want to transfer your personal data, which you provided to us in the past. You can request to receive it yourself or for it to be transferred to another organisation by sending an email to [info@q16.ai](mailto:info@q16.ai) . Please notice we are not obliged to retain this data (for longer than is otherwise necessary) purely for the purpose of a potential data portability request in the future.

### **Contact**

To exercise your abovementioned rights or any other questions concerning this Privacy Policy, please contact Q1.6 Data Protection Officer: Karolin Kruiskamp at [info@q16.ai](mailto:info@q16.ai) mentioning clearly the code of your Account and your request. If you would like to contact our DPO by traditional mail, please address your letter to Q1.6 BV, Franklin Rooseveltplaats 12 bus 14, 2060 Antwerp.

### **9. Data retention and deletion**

We may retain information regarding you and your use of our Product, including Personal Data, for as long as necessary to provide you with the Product and the uses described in this Privacy Policy.

At the latest two years after termination of the Agreement in accordance with article 15 of the Terms of Use, your Personal Data will be deleted. However, upon the aforesaid period Q1.6



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will be entitled to keep storing and using this data for statistical and scientific purposes provided that this data is anonymised and the processing respects the legal requirements concerning the processing of data for historical, statistical and scientific purposes. Such data will no longer allow to identify you as a person.

### 10. Updates or changes to our Privacy Policy

Occasionally, we may change or update this Privacy Policy to allow us to use or share your previously collected Personal Data for other purposes. If Q1.6 would use your Personal Data in a manner materially different from that stated at the time of the collection, we will provide you with a notice on our Website and in our Application indicating that the Privacy Policy has been changed or updated and request you to agree with the updated or changed Privacy Policy.

### 11. Roles and Responsibilities

Q1.6 is the data (sub-)processor and processes Customer Data as instructed by our customers (data controller). Q1.6 processes Customer Data as instructed by our customers, and has no direct control or ownership of the Personal Information it processes. Q1.6 will not share or distribute Customer Data except as provided in the contractual agreements between Q1.6 and our customers. These agreements may provide Q1.6 with the rights to process or use Personal Information for Q1.6 business purposes including providing or developing the Q1.6 platform and applications, preventing or addressing service issues, support or technical problems, responding to our customer's instructions, or as may be required by law.

Q1.6 BV

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2060 Antwerp

Data Protection Officer: Karolin Kruiskamp

Email: [info@q16.ai](mailto:info@q16.ai)

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