

# PRIVACY POLICY FOR VISIBA CARE

Dear User,

Visiba Care (the “**Service**”) is a web-based service for modern caregivers such as nurses, doctors, psychologists or therapists (in the following collectively “**Caregivers**”, each a “**Caregiver**”) that allows the Caregiver to set up a digital telehealth practice, just like an ordinary consultation – except that it takes place via online video meetings.

The Service is provided by Visiba Group AB, corporate registration no. 556967-9813, a limited liability company incorporated under the laws of Sweden, with its registered address at Adolf Edelsvärdsgata 11, 414 51 Göteborg (“**Visiba**”, “**we**” or “**us**”).

Under the Swedish Personal Data Act (1998:204), which implements the EU Directive 95/46/EC, the entity deciding the purposes and the means of processing is the personal data controller for the processing. When you use the Service, your Caregiver is the personal data controller for the processing of your Personal Data, and we are the personal data processor of your Caregiver, processing such data on behalf of and according to the instructions of said Caregiver. The identity and contact information of your Caregiver is stated below in section 6.

Your privacy is important to us. This document contains a policy statement regarding the collection, use and processing of personal data by the Caregiver within the Service and your rights in relation to your personal data. It also contains information regarding Visiba’s collection of and processing of certain anonymized data for certain limited purposes.

With “**Personal Data**” we mean information which is directly or indirectly referable to a natural living person, e.g. name and address but also health information. When using the Service, Personal Data will be collected from you.

In order to use the Service you must first read and accept this Privacy Policy.

## 1. PROCESSED DATA

The following personal data is collected and processed by your Caregiver:

- (a) name;
- (b) personal identity number;
- (c) e-mail address;
- (d) telephone number; and
- (e) reason for the online video meeting.

Additionally, information about your health which you share with your Caregiver during the online video meeting, will be collected.

## **2. PURPOSES OF PROCESSING**

### Caregivers

It is the Caregiver that decides the purposes for the processing of your Personal Data and each Caregiver may choose to communicate other purposes with you, such as research purposes if your use of the Service is carried out in relation to a research project. Unless otherwise agreed between you and your Caregiver, the Caregiver will process the Personal Data set out above for the following purposes:

- (a) in order to carry out the online video meeting via the Service and in order to examine you to be able to provide you with medical advice.
- (b) to administrate your account, improve your experience with the Service, and to otherwise provide the Service; and
- (c) to send you alerts or messages by email or otherwise.

Also, please note that your Caregiver may process your Personal Data for the purposes of responding to legal requests and to prevent harm, as further described in section 5 below.

### Visiba

As provider of the Service, Visiba collects and processes your Personal Data for its own, limited purposes; firstly to anonymize and pseudonymize your Personal Data specified below and then to (i) develop and improve the Service by using such anonymized or pseudonymized data, (ii) carry out research and analysis based on accumulated anonymized or pseudonymized data, and (iii) to commercially exploit the results of such research, statistics and analytics.

We will anonymize the Personal Data to an extent that we will not have the possibility to identify you by use of the data in our possession. We will only collect and store data regarding:

- (a) birth year, gender and place of residence/country;
- (b) the reasons for which you sought treatment, the outcome and length of the visit and how satisfied you were with the use of the Service; and
- (c) what technical platform and operating system you used in connection with the use of the Service.

## **3. SECURITY AND SUB-PROCESSORS**

Visiba currently offers the Service via Glesys. You can find more information about Glesys' services and security [here](#), including e.g. information on location of servers. Glesys is the sub-processor of your Personal Data, engaged by Visiba materially to store the Personal Data processed on behalf and according to the instructions of the Caregiver in the Service in the Glesys cloud.

## **4. TRANSFER TO THIRD PARTIES AND TO THIRD COUNTRY**

Your Personal Data will not be transferred to third parties or to a country outside the EU/EEA without your consent.

## **5. RESPONDING TO LEGAL REQUESTS AND PREVENTING HARM**

Your Caregiver may access, preserve and share your information in response to a legal request (like a search warrant or a court order), or when necessary to detect, prevent and address fraud and other illegal activity, to protect themselves, you and other users, including as part of investigations, if the Caregiver has a good faith belief that the applicable law so requires.

Information that your Caregiver receives about you, may be accessed, preserved and retained for an extended period of time when it is the subject of a legal request or obligation, government investigation, or otherwise to prevent harm.

## **6. SOME OTHER THINGS YOU NEED TO KNOW**

### **Your Privacy Rights under EU law**

EU law permits residents of the Member States once per calendar year to request details about what personal information is stored with us, the source of the data and the identity of parties to whom the data has been provided, free of charge, without indicating any reasons. Such a request shall be put to your Caregiver, being the personal data controller of your Personal Data.

You can object to the use of your personal data at any time and revoke the consent to use your data that you provided upon your registration. In addition, you can request rectification, erasure or blocking at any time of any personal data that is inaccurate.

### **The Identity of your Caregiver**

To exercise the aforementioned rights, or if you have any questions about our sharing practices, your rights under EU law, or wish to have your personal information removed, please contact your Caregiver.

## **CONSENT**

By clicking the **"I accept the Privacy Policy"** button you explicitly consent:

- (a) to the collection and processing of Personal Data, including health data, as set out in this Privacy Policy by the Caregiver;
- (b) to the collection and processing of Personal Data, including health data, as set out in this Privacy Policy by Visiba.

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