

## 1. Introduction

INNOVATION SPRINT SPRL, a Data Processor with details:

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1200 Brussels, Belgium  
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E-mail: [info@innovationsprint.eu](mailto:info@innovationsprint.eu)

values the privacy of your personal data (hereinafter also mentioned as data) and the way you use our services.

The mission of INNOVATION SPRINT SPRL is to provide services to Life Sciences, Clinical Research domain and to individuals. To achieve its mission, INNOVATION SPRINT SPRL is utilizing its website for its product HEALTHENTIA ([www.healthentia.com](http://www.healthentia.com)) to present its activities and the company products (see also: <https://healthentia.com/privacy-policy-2/>).

The privacy notice of HEALTHENTIA App, in the context of its use by patients, can be found at: [https://healthentia.com/wp-content/uploads/2023/01/PRIVACY-POLICY-HEALTHENTIA-EN-v6\\_16-11-2022.pdf](https://healthentia.com/wp-content/uploads/2023/01/PRIVACY-POLICY-HEALTHENTIA-EN-v6_16-11-2022.pdf)

This Privacy Policy addresses to natural persons (also mentioned herein as “data subjects”) and refers to how INNOVATION SPRINT SPRL collects and processes your personal data as beneficiary of the HEALTHENTIA SaaS and informs you about your rights in accordance with the General Data Protection Regulation of the EU 2016/679, also known as GDPR.

Under GDPR, Healthentia SaaS beneficiaries act as data controllers and INNOVATION SPRINT SPRL acts as data processor (with registered Address: Clos Chapelle-aux-Champs 30, 1200 Brussels, Belgium, Tel: +32 2 880 62 90, TVA BE 0648786874). For more details, please see: [https://healthentia.com/wp-content/uploads/2023/01/INNOVATION-SPRINT-DATA-PROCESSING-AGREEMENT-v2\\_01-12-2022.pdf](https://healthentia.com/wp-content/uploads/2023/01/INNOVATION-SPRINT-DATA-PROCESSING-AGREEMENT-v2_01-12-2022.pdf)

## 2. What is personal data

Personal data means any information relating to you, which allows us to identify you, such as your name, contact details, information about your access to Healthentia SaaS and other embedded services (for more information, please see the relevant IFUs of Healthentia App, as presented in <https://healthentia.com/saas-agreement/>).

## 3. HEALTHENTIA SaaS description, data collection and purpose of use

To achieve its mission INNOVATION SPRINT SPRL makes various features and functionalities (“Services”) available to you as SaaS beneficiary.

In general, HEALTHENTIA is a medical decision support software developed by INNOVATION SPRINT SPRL and intends to monitor, detect, offer virtual coaching services, and generate automatic alerts regarding events, based on Real World Data gathered from patient taking part of clinical investigation, or using it as a medical or wellbeing device. In this context, HEALTHENTIA is a software intended for monitoring of non-vital parameters to support decision making and virtual coaching of patients during clinical trials or under a medical or wellbeing treatment context. HEALTHENTIA facilitates the clinical trial optimization, by accelerating the trial processes, reducing the failure rate, and validating drug/intervention efficacy and effectiveness with Real World Data insights. HEALTHENTIA e-Clinical solution is collecting data from patients and investigators by means of the Healthentia App. Collected data is used for the needs of clinical studies of affiliated sponsors as described in their separate privacy policies (INNOVATION SPRINT SPRL acts as processor), while processing of anonymized data allows the provision of smart services to the patients, as well as the long-term research activities of INNOVATION SPRINT SPRL. In this way, pharmaceutical industry can achieve cost savings, accelerate the drug approval process, and obtain useful insights to develop drugs and interventions of higher efficacy in order to improve the life quality of humans.

In the context described above, INNOVATION SPRINT SPRL collects and processes your data:

- For the performance of the Healthentia SaaS contract (including business transactions, pricing and services offerings).
- When you are requesting information or you are contacting us to submit questions or complaints.
- To comply with a Legal or Regulatory Obligation (including for example accounting and tax requirements).
- To inform you about the new products and services of INNOVATION SPRINT SPRL as well as to invite you to an event.
- To protect our legitimate business interests, for example, fraud prevention, maintaining the security of our network and services, and the improvement of our services. Whenever we rely on this lawful basis to process your data, we assess our business interests to make sure they do not override your rights. For more information, visit the 'Your rights' section (Section 12) of this Policy.
- When you visit INNOVATION SPRINT SPRL websites. We use cookies to collect information about how you use our websites. In this way we can adapt to your interests and needs by recording details that will allow us to recognize you the next time you visit our websites.

Details of the personal data INNOVATION SPRINT SPRL may collect follows in the next section (Section 4) and in Sections 5, 6 and 9.

#### **4. Types of collected personal data**

When registering an account in Healthentia SaaS, INNOVATION SPRINT SPRL may collect and process different types of your personal data, such as:

- Name, surname, VAT number, physical and e-mail addresses, fixed and mobile phone numbers
- Organization information
- Financial data
- Information about your professional specialty-activities
- Our communication – i.e., e-mails and/or letters

Healthentia App also provides video conferencing capabilities between a patient and you as SaaS beneficiary. It should be noted that no video recording is allowed during the provision of this service. This processing includes hosted or cloud video conferencing and messaging services, involving the collection, organization, storage, retrieval, consultation and use of such personal data, video conferences products and technology and related support services and account management: provisioning, reporting, customer/end-user support & billing. Video conferencing services include the processing of the following categories of data: call record logs (which contain statistics such as the time and duration of calls made or attended by an individual, the number of participants on each call, circumstances of the individual disconnecting from the call, statistics on the version of endpoint used to make the call), contact information (including the individual's user name, E-mail address, Display name used to join the call, IP address, telephone number).

#### **5. Device information**

When you access Healthentia SaaS, our servers may record data regarding your device and the network you are using to connect with INNOVATION SPRINT SPRL, such as IP, date/time stamp, connection-related and device-related information for fraud prevention, maintaining the security of our network and services, and the improvement of our services.

#### **6. Information from third – parties**

We may collect information from 3rd parties, in case you provide your consent to the relevant provider based on your preferences and your agreement to use your data from 3rd parties.

#### **7. Personal information disclosed to third – parties**

Recipients of your data are our agents and/or subcontractors, in order to support, promote and execute our business relationships. As a general rule, INNOVATION SPRINT SPRL does not transfer your data to third parties except when clearly required by the Legislation/Regulatory framework or in the context of optimizing the services provided to the Healthentia SaaS beneficiaries (e.g., promotional services). The above transfer takes place to the extent required for the provision of our services. Such third parties may be official Supervisors / Government Bodies / Auditors / Law Firms and/or legal counselors, when we are required to comply with the legislation / regulations on Certification / Training Bodies or/and to prevent us and the Healthentia SaaS beneficiaries against illegal actions (e.g., fraud, insult, infringement of personality rights, etc.).

Also, access to your data is given to the absolutely necessary staff of INNOVATION SPRINT SPRL, who are bound by confidentiality agreements and have been properly trained.

Our associates/ representatives/ subcontractors have agreed with the Company and are contractually bound in writing:

- To keep confidentiality and bind their staff with the necessary NDAs.
- Not to transfer data to third parties without our written permission.
- To take organizational and technical data security measures for the protection of your personal data.
- To inform us of any incident relating to the breach of your personal data, delete or/and return your personal data to us, upon the termination of our contract between them.
- To comply with the legal framework for the protection of personal data, in particular with GDPR.

## **8. Security measures**

INNOVATION SPRINT SPRL is committed to protecting the security of your information and takes reasonable precautions to protect it. Once we receive your data transmission, we make all commercially reasonable efforts to ensure its security on our systems.

We implement and maintain appropriate technical and organizational measures to ensure a security level appropriate to protect personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal information transmitted, stored or otherwise processed. We train all our employees meticulously to follow the principle of strict compliance with all legal requirements. Certain INNOVATION SPRINT SPRL Services support the use of standard SSL encryption to protect data transmissions. Your personal information and data stored in our systems is protected by various physical, electronic and procedural safeguards. It is housed in a secure facility, and INNOVATION SPRINT SPRL and our hosting partners restrict physical and network access to this facility to select trained staff. Your INNOVATION SPRINT SPRL password is protected by encryption so that only you have access to it.

We regularly evaluate and review our technologies, facilities, procedures, and potential risks to maintain the security and privacy of personal data. In any case we will destroy or de-identify personal information once we no longer require it for our business purposes as explained herein, or as required by law.

INNOVATION SPRINT SPRL is not responsible for any 3rd party's actions or their security controls with respect to personal information they may collect or process via their websites, services or otherwise.

## **9. Cookies - Tracking data**

Healthentia SaaS does not use cookies.

## **10. Data Retention**

INNOVATION SPRINT SPRL will not retain data longer than necessary to fulfil the purposes for which it was collected or as required by applicable laws and regulations. The data you provide us may be archived and stored periodically and will only be retained for as long as it is required for the purposes it was collected, unless the law requires us to retain them for a longer period, or delete it sooner, or unless you exercise the right to erasure (where it applies), when we do not need to retain it in connection with any reasons permitted or required by law. After termination of the SaaS contract, data will be retained for maximum 10 years after last data collection.

## **11. International Transfers**

We may need to transfer your information to other companies or service providers in countries outside the European Economic Area (EEA). The EEA consists of countries in the European Union, Switzerland, Iceland, Liechtenstein, and Norway: they are considered to have equivalent laws when it comes to data protection and privacy. This kind of data transfer may happen if our servers (i.e., where we store data) or our suppliers and service providers are based outside the EEA, or if you use our services and products while visiting countries outside this area. If INNOVATION SPRINT SPRL sends your information to a country that is not in the EEA, we will make sure that your information is properly protected. We will always ensure that there is a proper legal agreement that covers the data transfer. In addition, if the country is not considered to have laws that are equivalent to EU data protection standards then we will ask the 3rd party to enter into a legal agreement that reflects those standards. In such cases, specific privacy notices are made available.

Data hosting of Healthentia SaaS is utilizing the services of Microsoft Azure in servers of European Union member states. Microsoft's contractual commitments with regards to GDPR can be found in the Online Services Data Protection Addendum:

<https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>

Video conferencing services are provided by «Vidyo Cloud Services» (the Vidyo cloud subscription service provides access to the Vidyo Cloud Applications enabling video collaboration with patients). A signed Data Processing Agreement has been signed between INNOVATION SPRINT SPRL and Vidyo (Enghouse). No transfer of data outside the EU/EEA area takes place in this case.

## **12. Your Rights**

INNOVATION SPRINT SPRL ensures that you can under specific circumstances exercise all relevant rights in relation to your personal data, such as the right of access to your data, right to rectification, right to erasure, right to data portability, right to restriction of processing, right to object, right not be subject to automated decision making if human intervention is not taken under consideration and the necessity of the processing is not granted, and finally right of lodging a complaint towards the supervisory authority (<https://www.dataprotectionauthority.be/citizen>).

It should be noted that no automated decision-making process takes place in the course of our business activities.

You can exercise your rights at any time by contacting us here: [dpo@healthentia.com](mailto:dpo@healthentia.com). An identification stage might be required before proceeding towards fulfilling your request. In this case, we will reply within one month or up to three after informing for the reasons of delay. However, if you still have doubts about the information provided by us upon exercising your rights you also have the right to lodge a complaint with a supervisory authority.

## **13. Changes to this Privacy Policy**

Use of the personal data collected is subject to the Privacy Policy in effect at the time such information is used. As INNOVATION SPRINT SPRL evolves, we may need to update this Policy from time to time to keep pace with changes in the Service and laws applicable to us and to you; we will, however, always maintain our commitment to respect your privacy.

## **14. How to contact us**

Innovation Sprint SPRL, Address: Clos Chapelle-aux-Champs 30, 1200 Brussels, Belgium, Tel: +32 2 880 62 90, TVA BE 0648786874).

If you have questions, comments or requests about this Policy and your personal data, please contact us by submitting a request at: [dpo@healthentia.com](mailto:dpo@healthentia.com).

The present Privacy Policy was reviewed on January 19<sup>th</sup>, 2023.