

Privacy Policy – Sine Monitoring

Effective May 24, 2024.

1. About us

Sine Monitoring is a mobile application aimed at collecting and analyzing behavioral data gathered from smartphones of participants for the sole purpose of supporting scientific (and medical) research endeavors (collectively, the “**Services**”). The Services will only be present in formal scientific studies that are set up to adhere to standards, regulations and ethical considerations that apply to human subject research (the “**Studies**”). The Sine Monitoring application is operated and owned by Jakob Gerstl and Gustaf von Grothusen. From time to time researchers at research sites may be involved in organizing the Studies (the “**Affiliated Researchers**”).

From the perspective of a participant, your experience with Sine Monitoring will mainly revolve around our smartphone application, which is responsible for collecting said behavioral data from your smartphone. In this Privacy Policy we will tell you about the kinds of data that we collect, how we use the data and how we protect the data and by extension your privacy.

2. Applicability of this Privacy Policy

This Privacy Policy (the “**Privacy Policy**”) explains how we collect, use, share and otherwise process information via the Sine Monitoring application. This also includes information that may be used to identify you (“**Personal Information**”).

“**User**,” “**you**” and “**your**” refer to the individual or entity that accesses or otherwise uses the Services, and each of your heirs, assigns, and successors.

This Privacy Policy applies to information we collect, including Personal Information of any visitor to or User of our Services. Some of the Personal Information we process may also be “protected health information,” as that term is defined under the Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”) in our capacity as a business associate on behalf of a covered entity or business associate (as those terms are defined in HIPAA). Jakob Gerstl and Gustaf von Grothusen do not control how these customers, partners, covered entities, or business associates use information we process on their behalf. If you wish to exercise any of your rights with respect to your Personal Information for Personal Information we process as a processor on behalf of our customers, partners, covered entities, or business associates please contact the applicable entity directly.

We may update this Privacy Policy from time to time. If we make material changes to this Privacy Policy, we will notify you of any changes by posting notice on our Services, sending notice to the primary email address specified in your account (if applicable), or otherwise notifying you. We encourage you to periodically check the Services for updates.

You acknowledge that your use of our Services indicates to us that you have read this Privacy Policy and consent to the privacy practices described, and your continued use of our Services after we publish or send a notice about any changes to this Privacy Policy indicates that you have read and consent to the updated Privacy Policy.

3. What Information Do We Collect?

We collect information, including Personal Information, that you give us when you create an account, contact us, or otherwise access or use our Services. We collect information you voluntarily submit to us, information from third parties, and we also automatically collect information when you access or otherwise use the Services.

The exact information collected from your smartphone will be clearly communicated to you before you decide whether to install the app. When you use our Services, you may provide information to us directly. Below, we provide a full overview of the data collection capabilities of the app, which may or may not be activated for you.

Accelerometer and general motion: we continuously monitor the accelerometer sensor of the device recording the expression of motion as vectors along an x, y and z axis.

Device information: we store information describing the type of device you use such as the iOS version, brand, model etc. for quality control purposes. This information does not include any unique device identifiers available on the iOS platform. Health information, such as medical or health conditions or symptoms, medications, medication summaries, medical history and similar information.

Surveys: we store survey data such as research surveys or surveys about our products and services.

You are not required to provide us with such information, but certain features of the Services may not be accessible or available, absent the provision of the requested information.

4. How Do We Use The Information We Collect?

We use the information we collect for a variety of purposes, including to improve the Services, optimize our technology and algorithms, refine and customize our offerings and user experience, experience of our Users, and innovate ways to forward our mission.

We may combine information that we collect from you through the Services with information that we obtain from affiliated and nonaffiliated third parties, and information derived from any other products or services we provide.

We may convert your personal information into an anonymized form. Once converted, you will no longer be able to be identified or identifiable from the data, and the information will not be able to be linked back to you. We may share such anonymized information with our trusted research partners for the purpose of conducting scientific research, including identifying new treatment strategies for long-term condition management.

Please note, we will only ever share the minimal amount of information necessary for this purpose, and we will not sell or share any of your personal information or sensitive personal information to third parties for marketing purposes.

5. Who has access to your information?

Your information will only be directly accessible by Jakob Gerstl, Gustaf von Grothusen and the Affiliated Researchers with relevant job roles regarding the handling and analysis of data. All researchers have received instructions to ensure a secure and responsible working environment, as specified in our information security policy, wherein your data will be used.

6. When We Disclose Your Personal Information?

We may disclose your information in the following situations:

Service Providers. We work with a wide range of third party providers, notably our database administrators, cloud computing services, advertising services, data analysts, application service providers, bulk SMS services, and other non-governmental organizations.

Business Transfer. We may also transfer your Personal Information to a third party as a result of a merger, acquisition, reorganization or similar transaction, or in contemplation of such a transaction.

Legal Purposes. We may share your information when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of the Services; and to protect the rights or property of Jakob Gerstl and Gustaf von Grothusen.

We may also share your information with non-affiliated third parties if we have a good-faith belief that access, use, preservation, or disclosure of your Personal Information is reasonably necessary to (i) detect or protect against fraud or security issues, (ii) meet any enforceable government request, (iii) defend against legal claims, or protect against harm our legal rights or safety, or that of our staff or Users.

7. How Do We Secure Your Personal Information?

We take steps to protect your Personal Information against unauthorized access, alteration, disclosure, misuse, or destruction. Unfortunately, no data transmission or storage system can be guaranteed to be one hundred percent (100%) secure. The safety and security of your Personal Information also depends on you. You are solely responsible for keeping your account details confidential, including any access credentials like passwords or mobile device PINs.

8. Your Choices Regarding Your Personal Information

Under applicable data protection laws, you have several rights in respect of your personal information that may apply in certain circumstances. You have several choices with respect to the use of Personal Information on our Services, though certain information may be exempt from such requests as authorized by applicable law:

Right to download or access personal information. You can ask us for a copy of your Personal Information, as well as information about its processing, and can ask for a copy of your Personal Information (including in machine readable form).

Right to object to processing. You have the right to object to (i) any processing of your personal information that we carry out based on our legitimate interests, and (ii) any decision we make which is based solely on automated processing.

Right to restrict processing. You have the right to require us to restrict processing (i) where the personal information we are processing is inaccurate, or (ii) where the processing we are carrying out is unlawful.

Right to be informed. You should have clear, accessible and transparent information provided to you so you understand how we work, and how we protect and use your personal information.

Right of access to your information. You have the right to receive confirmation of whether or not we process your personal information, and where we do, you have the right to access it and be provided with certain information in relation to it. This enables you to check we are using your information correctly.

Right to rectification. You have the right to require us to correct any inaccuracies wherever you see that we hold incorrect or incomplete information about you.

Right to erasure. You have the right to require us to erase your personal data (i) where we no longer need it for the purpose for which it was collected, (ii) where the processing we are carrying out with that information is unlawful or (iii) where erasure is required in order for us to comply with a legal obligation. Please note, if you request us to delete your personal information, the deletion process can take up to six (6) months, and in some cases, we may not be able to satisfy your request where we are required to retain your personal information for legal and regulatory purposes.

Right to move your data. You have the right to require us to provide you with your information in a structured, commonly used and machine-readable format so that it can be transferred to another provider. This is referred to as portability.

Right to withdraw your consent. You have the right to withdraw your consent where we process your personal information and/or sensitive personal information on the lawful basis of consent. This means that you remove our ability to use your information for such processing unless there is another lawful basis that we can rely on to do so. You may withdraw your consent at any point and without providing a reason for doing so, however please note that withdrawing your consent will mean that you will no longer be able to use or access certain aspects of our app(s) / service(s).

9. Links to Third Party Websites

We may provide links to other websites. We have no control over these websites and they are subject to their own terms of use and privacy policies. As such, we do not endorse and are not responsible for the availability of, or for any content, advertising, products, or other materials on or available from, these third party websites.

By using the Services, you agree that we will not be liable for any damage or loss caused by your use of or reliance on any content, advertising, products, or other materials on or available from these third party websites.

10. Changes to this Privacy Policy

Use of the information we collect now is subject to this Privacy Policy in effect at the time such information is used. As the Sine Monitoring application evolves, we may need to update this Privacy Policy from time to time to keep pace with changes in the service and laws applicable to us and you; we will, however, always maintain our commitment to respect your privacy.

We keep this policy under regular review as part of a continuous data protection impact assessment (“**DPIA**”) cycle mandated by the European General Data Protection Regulation (“**GDPR**”) and as such may be updated over time.

If we make material changes in the way we use personal information, we will notify you of any changes by posting notice on our Services, sending notice to the primary email address specified in your account (if applicable), or otherwise notifying you, and we may ask for your consent to such changes if required by applicable law. If you disagree with any changes in this Privacy Policy and do not wish your information to be subject to the revised Privacy Policy, you will need to delete your data following the above.

11. How to contact us

Under GDPR Jakob Gerstl and Gustaf von Grothusen is the data controller for data protection purposes. If you have questions, comments or requests about this Privacy Policy and your Personal Information, please contact us by submitting a request at: jakob.rydelius@gmail.com.