# General Privacy Policy

Château Santé is a company specialized in the measurement of health conditions of patients by using modern scientific measurement models and user-friendly software tools. The company is located in Zeist, the Netherlands. We understand, acknowledge and respect any individual's right to privacy and the concerns one may have regarding privacy and security. Therefore, implementation of confidentiality and security measures in our software tools are built in and are fulfilling currently accepted standards. Your personal data will be processed in compliance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and any applicable laws.

Château Santé and its affiliates do not collect information that could personally identify you. A visitor can respond to clinical studies conducted by and on behalf of Château Santé and utilize the HealthSnApp platform at any time without providing any personal information. Personal information, such as gender, date of birth, email address or other personal information is not collected in our standard software application. In case additional items (Survey module) are added to the HealthSnApp platform by the researcher, the collection of any personal information is not allowed.

Château Santé is working with qualified investigational sites such as hospitals, clinics, academic institutions, responsible to include and follow the subjects in (clinical) studies. The eligible subjects will be first invited to consent by the investigator. If they agree to participate, the subjects will report their health status in a survey available on a secured web-application entitled 'HealthSnApp'. To access this platform, each participant will receive an e-mail containing the web address (URL) and their user credentials. The email address utilized for communication purposes is not retained by the HealthSnApp platform, being removed immediately and irretrievably after emails are confirmed or after two weeks in case of not responding.

The responses to the online questionnaire will be coded. Chateau Santé and its affiliates will have only access to your coded data and will not be able to directly identify you. Only the investigational staff, bound to confidentiality, have access to your personal information.

#### Direct Contact with Château Santé by Users

Our platform contains forms through which users may request information or supply feedback to us. In all cases the study subjects will be allocated a numeric username which can be utilized in order to maintain the anonymity of previously provided answers. The same numeric username shall be utilized in order to request a complete removal of all previously provided data. Château Santé will never ask for (and you shall never provide) personal data in order to respond to queries or requests initiated by the Study Subject, nor can it utilize such information since it is not stored nor linked anywhere in our databases.

# Survey data

The information from surveys is used to describe your own health condition, to perform statistical analysis in aggregate form, and to help us generate measures regarding the health status of various study groups. We do not ask for information in our surveys that would personally identify you. For the distinct

studies we will keep a unique identifiable identifier (UID), which will be removed after a study is finished. Subsequently, data from different studies will be merged without any UID or personally identifiable information (PII). The aggregated data is stored, and we do not use the data for external purposes.

# <u>Email</u>

"Phishing" is a scam designed to steal your personal information. If you receive an email that looks like it is from Château Santé asking you for your personal information, do not respond. We will never request your password, username, credit card information or other personal information through email.

# Username and Password

In the event you access any Service requiring a Username and Password, you are solely responsible for keeping such Username and Password strictly confidential. Using the credentials provided would permit an ill-intended user exclusively to impersonate you within the study and provide additional answers on your behalf, not access information which was provided by you in the past.

#### **IP Addresses**

The Web server automatically collects the IP (which stands for Internet Protocol) address of the computers that use our application. An IP address is a number that is assigned to your computer when you access the Internet. We use this information in aggregate form to understand how our platform (HealthSnApp) is being used and how we can better serve visitors. IP addresses are systemically and irretrievably deleted from our servers once the data has been aggregated. Please note it is possible to determine from an IP address a visitor's Internet Service Provider and the geographic location of his or her point of connectivity.

#### Non-personal information

Château Santé collects non-personal information such as usage, traffic patterns, application performance and related statistics based on our tracking of application utilization.

## First Party Cookies

We collect information about users to our application using "first party cookies", which are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser. Cookies are never associated with specific personal identities. First party cookies are distinct from third party cookies that they are created and directly served by the company hosting the application.

We use two types of "cookies" in the application:

- 1. We use persistent cookies to recognize a repeat visitor, enabling us the opportunity to offer the visitor auto-login capabilities.
- 2. We use session cookies to track a visitor's path through our Application during a visit, to help us understand how people use our application.

You can delete our cookies at any time. The "help" section, located on the toolbar of most browsers, will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you

when you receive a new cookie or how to disable cookies altogether. Since cookies allow you to take full advantage of some of our Application's best features, we recommend that you leave them turned on.

#### **SECURITY OF YOUR INFORMATION**

Please note that our forms are encrypted to protect your privacy. Once the information is sent to our application, it is kept in secure databases where it is not available to users other than authorized.

Château Santé periodically reviews and modifies, where appropriate, its security policies and procedures. We use reasonable care to protect the information provided by you in our application. Château Santé has in place a security program that seeks to mitigate this risk substantially.

#### **DISCLAIMER OF WARRANTY**

MATERIALS, SERVICES AND OTHER INFORMATION ARE PROVIDED "AS IS" BY CHATEAU SANTE FOR RESEARCH PURPOSES ONLY. CHATEAU SANTE MAKES NO EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR USE, TITLE OR NON-INFRINGEMENT.

PLEASE NOTE THAT, BY ITS VERY NATURE, AN APPLICATION CANNOT BE ABSOLUTELY PROTECTED AGAINST INTENTIONAL OR MALICIOUS INTRUSION ATTEMPTS. FURTHERMORE, CHATEAU SANTE DOES NOT CONTROL THE DEVICES OR COMPUTERS OR THE INTERNET OVER WHICH YOU MAY CHOOSE TO SEND CONFIDENTIAL PERSONAL INFORMATION AND CANNOT, THEREFORE, PREVENT SUCH INTERCEPTIONS OF COMPROMISES TO YOUR INFORMATION WHILE IN TRANSIT TO CHATEAU SANTE.

THEREFORE, CHATEAU SANTE HEREBY MAKES NO GUARANTEE AS TO SECURITY, INTEGRITY OR CONFIDENTIALITY OF ANY INFORMATION TRANSMITTED TO OR FROM THIS APPLICATION OR STORED WITHIN THIS APPLICATION.

BEYOND OUR REASONABLE CARE TO SAFEGUARD YOUR INFORMATION WHILE IN TRANSIT, CHATEAU SANTE CANNOT AND DOES NOT GUARANTEE THE ABSOLUTE SECURITY OF ELECTRONIC COMMUNICATIONS OR TRANSMISSIONS SINCE ANY TRANSMISSION MADE OVER THE INTERNET BY ANY ORGANIZATION OR ANY INDIVIDUAL RUNS THE RISK OF INTERCEPTION.

# **LIMITATION OF LIABILITY**

YOU ASSUME THE SOLE RISK OF TRANSMITTING YOUR INFORMATION AS IT RELATES TO THE USE OF THIS APPLICATION, AND FOR ANY DATA CORRUPTIONS, INTENTIONAL INTERCEPTIONS, INTRUSIONS OR UNAUTHORIZED ACCESS TO INFORMATION.

IN NO EVENT SHALL CHATEAU SANTE BE LIABLE FOR ANY DIRECT, INDIRECT, SPECIAL, CONSEQUENTIAL OR MONETARY DAMAGES, INCLUDING FEES, AND PENALTIES IN CONNECTION WITH YOUR USE OF MATERIALS POSTED ON THIS APPLICATION OR CONNECTIVITY TO OR FROM THIS SITE TO ANY OTHER SITE.

CHATEAU SANTE MAY CHANGE THIS PRIVACY POLICY BUT WILL NOT DECREASE THE LEVEL OF SECURITY OR PROTECTION OF PERSONAL DATA.

Other services provided by Château Santé on this Application may require you to agree to additional terms.

BY USING THIS APPLICATION (HEALTHSNAPP) YOU ACCEPT THESE TERMS.

If you have any questions about our privacy policy or our use of information gathered through our Application, please call us at +31651701692 or chat with us directly at https://www.chateau-sante.info.

# **Security Statement**

Château Santé values your privacy and security. Your data is protected through Secure Socket Layer (SSL) 128-bit encryption, ensuring your confidential information is protected using both server authentication and data encryption technology.

For more information, please review our Application Terms of Use.

# **Customer Privacy Policy**

Effective Date: March 1, 2019

This Privacy Policy applies to the HealthSnApp or mobile application and the "Services" provided by Château Santé

## I. Collection of Information

We may collect the following kinds of information when you use the Application:

- a. Username and password;
- b. Personal health information: Description of your health condition on a small set of health items, and indicators whether your own health condition is better or worse than a small set of hypothetical health conditions.
- c. Any other information you provide to us

We may combine such information with information we already have about you.

## Information we collect automatically

We may collect certain information automatically when you use our Application, such as your computer's Internet protocol (IP) address, device and advertising identifiers, browser type, operating system, Internet service provider, the date and time of your visit, information about the links you click and pages you view within the Application, and other standard server log information. We may also collect certain location information when you use our Services.

We may use cookies, pixel tags, Local Shared Objects, and similar technologies to automatically collect this information. Cookies are small bits of information that are stored by your computer's web browser. Pixel tags are very small images or small pieces of data embedded in images, also known as "web beacons" or "clear GIFs," that can recognize cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device. Local Shared Objects (sometimes referred to as "Flash Cookies") are similar to standard cookies except that they can be larger and are downloaded to a computer or mobile device by the Adobe Flash media player. By using the Services, you consent to our use of cookies and similar technologies.

We may also collect technical data to address and fix technical problems and improve our Applications. Your device or browser settings may permit you to control the collection of this technical data. By using the Applications, you are consenting to us or any party acting on our behalf collecting this technical data.

## II. Use of Information

We generally use the information we collect from you to:

- a. Conduct clinical research using your information;
- b. If you have already consented in participating in a clinical research or other type of health care study or survey, this application will collect only information needed for the study execution.
- c. Analyze the use of the Services and user data to understand and improve the Services;
- d. Prevent potentially prohibited or illegal activities and otherwise in accordance with our Terms of Use;

e. For any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

# III. Sharing of Information

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect.

We will not share your information with third parties.

Third parties will, nonetheless, get access to the following categories of information:

- The username.
- The description you make regarding your own health conditions
- The computed total score for the study

Legal purposes. We may disclose information to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries.

We may also choose to disclose information in order to protect and defend the rights, interests, health, safety, and security of Château Santé, our affiliates, and users. If we are legally compelled to disclose information about you to a third party, we will attempt to make you aware of that situation by posting public announcements on our website, our Facebook page and national media for all the countries where we operate.

Business Transfers. We can transfer your information as part of a transfer of the assets of the organization, merger, or consolidation or in the unlikely event of bankruptcy, if such transfer is permissible under law.

#### IV. Security

We use measures to protect collected information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. We use measures designed to protect other information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure.

# V. Your Choices/ The right to be forgotten

You may also request, in the case that personal information is collected, that we delete your personal information by calling us or chatting with us on the following [info@chateau-sante.com].

We will delete such information unless we are required to maintain information in accordance with applicable law.

Previously provided Numeric Username should be utilized in order to request a complete removal of all previously provided data. Château Santé will never ask for (and you shall never provide) personal data in order to respond to queries or requests initiated by the Study Subject, nor can it utilize such information since it is not stored nor linked anywhere in its own databases.

You may be able to refuse or disable cookies by adjusting your web browser settings. Because each web browser is different, please consult the instructions provided by your web browser (typically in the "help" section). Please note that you may need to take additional steps to refuse or disable Local Shared Objects and similar technologies. For example, Local Shared Objects can be controlled through the instructions on Adobe's Setting Manager page. If you choose to refuse, disable, or delete these technologies, some of the functionality of the Services may no longer be available to you.

## VII. International Users

We maintain information in The Republic of Ireland and in accordance with the laws of the European Union, which may not provide the same level of protection as the laws in your jurisdiction. By using the Services and providing us with information, you understand and agree that your information may be transferred to and stored on servers located outside your resident jurisdiction and, to the extent you are a resident of a country other than The Republic of Ireland, that you consent to the transfer of such data to the Republic of Ireland for processing by us in accordance with this Privacy Policy.

# VIII. Children

Children below 18 are not authorized to access our Applications without parental approval.

We may update this Privacy Policy from time to time. When we update the Privacy Policy, we will revise the "Effective Date" date above and post the new Privacy Policy. We recommend that you review the Privacy Policy each time you use the Applications to stay informed of our privacy practices.

## IX. Questions?

If you have any questions about this Privacy Policy or our practices, please call us at +31651701692 or chat with us directly at <a href="https://www.chateau-sante.info">www.chateau-sante.info</a>.