

## **Data Security Policy**

### **Summary of how we use your data**

- Hermes Healthcare Limited (“myAlgos app”/”we”/”us”) uses your personal data to track and analyze data recorded by you in our Apps, including for use in research projects and studies and with healthcare professionals.
- Data is shared with medical, health or other professionals you authorize to have access to your data. If you are taking part in a global study, project or programme your data may be sent to an international dataset or repository outside of the country in which you reside. You will be clearly informed if your data will be used in this way.
- Where we rely on your consent, such as for contributing your data to research studies, sending your data to research datasets or to send your data to 3rd parties, you can withdraw this consent at any time.
- Our Apps and Services are designed to help you track your data, usually as part of a research project or study, or with a medical, health or other professional, who may be our partner. Access to the Apps and Services may therefore be made available to you via one of our partners.
- We believe that you should own the data you enter into our apps and that your data should only be used by you and professional clinicians and / or researchers where this is part of the study, project or programme you have signed up for.
- Your data will not be sold off or sent to other parties not involved in the specific study, project or programme you are part of.

### **What does this policy cover?**

We design, develop, operate and maintain software applications (the “App(s)”) to help people track their data, including for use in research projects and studies and with healthcare professionals. We create our own myAlgos Apps and we work with partners to create branded Apps using our technology for our partners to make available to their clients. Our partners may include, for example, health professionals, research institutions and pharmaceutical companies. Where we or our partners run a research programme using our Apps and you sign up to that research programme, we will collect and process data in accordance with the scope of activity for that research programme or project (which we or our partners will provide in writing prior to your agreeing to participate). Where one of our

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partners runs a research programme or project using our Apps, they will have access to your data for the purposes of that research programme or project. If you have any questions regarding a research programme or project in which you are participating or the data being processed about you for that research programme or project, please contact the sponsor organisation for that research programme or project. Our Apps, Sites and Services may contain links to and from the online properties of our customers, partner networks, advertisers and affiliates or other third parties. If you follow a link to any of these online properties, please note that these online properties have their own privacy policies and that we cannot and do not accept any responsibility or liability for these policies. Please check these policies carefully before you submit any personal data to these websites. This policy describes how Hermes Healthcare (myAlgos app) will make use of your data in relation to:

- our Apps once you have downloaded a copy of the App onto your mobile telephone or handheld device (“Device”);
- any of the services accessible through the Apps (our “Services”); and
- any of our websites including without limitations the Hermes Healthcare website located at: [www.hermes.health](http://www.hermes.health) and all subdomains and paths (our “Sites”).

It also describes your data protection rights, including a right to object to some of the processing which myAlgos carries out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

## **Our Core Principles**

**OWNERSHIP** - You own your data

**CHOICE**- You decide how much personal data you provide when using the Apps

**TRANSPARENCY** - we will always tell you what data we hold about you and what we do with this data

## **What information do we collect?**

We collect and process personal data about you when you interact with us and our Apps, Services and websites. We may collect and process the following data about you:

- Information that you provide by filling in forms or surveys on our Site or Apps. This includes information you provide when you register on our Sites or Apps and

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open an account, post material or request further services. We may also ask you for information when you report a problem with our Sites, Apps or Services.

- If you contact us, we may keep a record of that correspondence.
- When you visit our Sites or Apps or interact with our Services, we (and our other service providers) may use a variety of technologies that automatically or passively collect information about how our Services are accessed and used (“Usage Data”). Usage Data may include:
  - the type of mobile device you use (e.g. are you using an Apple or a Samsung Device);
  - a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface or the mobile phone number used by the Device);
  - mobile network information (e.g. are you on the 3 network or the Vodafone network?);
  - your mobile operating system (e.g. are you using an iPhone or an Android?);
  - your IP address and HTTP referrer information (e.g. the page served, the time, referring URLs);
  - the type of mobile browser you use (e.g. are you using the Chrome or Safari browser?);
  - time zone setting (e.g. GMT, EST?);

Usage Data helps us understand our users better and tailor content to their needs and interest. Usage Data is statistical data about our users' browsing actions and patterns and does not identify any individual. Please rest assured that we will treat Usage Data as personal data if we combine it with you as a specific and identifiable person.

### **What information do we receive from third parties?**

Sometimes, we may receive information about you from third parties. In particular, we may receive your name or email address from a healthcare professional, a hospital or care site, a study researcher or a project sponsor to invite you to use the myAlgos apps services. Any information received from third parties would be processed in the same manner as any data you enter into the myAlgos services.

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## **How do we use information collected by myAlgos app or received from 3rd parties, and what is the legal basis for this use?**

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you agree to participate in a research study, a project or a programme. This includes:
  - Creating a new account
  - verifying your identity to access your account;
  - sharing your data entered into our Apps with professional authorised users;
  - communicating with you about the research study, project or programme you have signed up to;
  - providing customer services and arranging the delivery or other provision of products, information or services related to the research study, project or programme you have signed up to;
- As required by Hermes Healthcare if to conduct our business and pursue our legitimate interests, in particular:
  - we will use your information to provide you with relevant information, products and/or services which you may request or which we may decide would fit your needs. For example, we may suggest ways in which you can better participate in a research study or the get the most from your patient support programme;
  - we monitor use of our websites and online services, and use your information to help us monitor, improve and protect our products, content, services and websites, both online and offline and ensure that content from our Sites and Apps is presented in the most effective manner for you and for your computer;
  - we use information you provide to personalize our website, products or services for you and notify you about changes to our Sites, Apps or Services;
  - we may provide aggregate user statistics, demographic information and Usage Data which does not identify you specifically with third parties. We may combine your Usage Data with those of other users of our products and services and share or provide this trend information in aggregated and anonymized form with third parties. For example, we may use your Usage Data as part of an aggregated number to assist a university, academic institution or a hospital with their medical research;

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- we may also use information collected from you and combine it with information provided by our other users of our products and services to help us improve the design and delivery of our software tools, increasing the effectiveness for all users. Data will usually be analyzed in an anonymous format by company employees and contractors to improve our products;
- we monitor customer accounts to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law;
- we use information you provide to investigate any complaints received from you or from others, about our website or our products or services;
- we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation); and
- we use data of some individuals to invite them to take part in research studies;
- Where you give us consent:
  - we place cookies and use similar technologies in accordance with our Cookies Policy (below) and the information provided to you when those technologies are used]
  - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:
  - where we need parental consent to provide online services to children under 16. However, most of our websites are not designed for children under 16.
  - In response to requests by government or law enforcement authorities conducting an investigation.

### **Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests.

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## **Who will we share this data with, where and when?**

Our Apps and Services are designed to help you track your data, usually as part of a research project or study, or with a medical, health or other professional, who may be our partner. Access to the Apps and Services may therefore be made available to you via one of our partners.

In registering to use the Apps and Services, you will have used a unique registration code. This unique registration code links your myAlgos app account to one or more of our online properties or to online properties of our partners. For example, your myAlgos account may be linked to a specific database for a research study or for a particular hospital or a doctor's surgery. Your data will be viewable by all professional authorised users of the online properties your account is linked to (researchers, site managers, doctors, nurses, practice managers, dieticians etc.). Your data will not be viewable by other patient users unless you elect otherwise. It may also be possible for your clinicians or health professionals to add data to your account (for example, a diary note, or a new task) as well as view any data you have entered. If you do not want your data to be viewed by anyone else, please email [hermes@hermes.health](mailto:hermes@hermes.health) - however you should be aware that this may affect how you and your clinicians and / or researchers use the Service.

If you have access to the Apps and Services via a Hermes Healthcare partner and that partner terminates its contractual relationship with Hermes Healthcare, you may no longer have access to the Apps and Services via that partner. Data uploaded whilst using the Apps and Services via the Partner may also no longer be accessible. If you would like further information about whether you will have continued access to the Apps and Services following termination of our contractual relationship with the relevant partner, please contact [hermes@hermes.health](mailto:hermes@hermes.health).

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on behalf of Hermes Healthcare for the purposes identified above. Such third parties include providers of website hosting, maintenance, call center operations (if this is part of a specific

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project or programme in which you are participating) and identity checking services where this is an essential part of your project or programme.

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

Our services are provided to studies, projects and programmes globally. User data is generally stored either in the EU or the USA, depending on each study, project or programme location or requirement and you will be informed of such arrangements on a case-by-case basis.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request to [hermes@hermes.health](mailto:hermes@hermes.health).

### **What rights do I have?**

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this data to another controller.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred.

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For registration into our Apps and Services and the verification of your identity the provision of information is mandatory: if relevant data is not provided, then we will not be able to create a new account, register you into your study, project or programme or securely log you into an existing account. All other provision of your information is optional. However, if you do not provide your information your experience in using our Apps and Services may be impaired and you may not receive the full benefit of using our Services with your healthcare professional or research team.

### **How do I get in touch with you?**

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch at [hermes@hermes.health](mailto:hermes@hermes.health) or by writing to Hermes Healthcare Limited, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ.

### **How long will you retain my data?**

If you want to stop using your myAlgos account, you can either deactivate or delete it. Deactivating your account puts your account on hold but we do not delete any of your information. You can deactivate your account by sending an email to [hermes@hermes.health](mailto:hermes@hermes.health) with the subject heading 'Account deactivation'. When you delete an account, it is permanently deleted from myAlgos. This process is irreversible. It typically takes us about 48 hours to delete an account, but some information may remain in backup copies and logs for up to 6 months. You should only delete your account if you are sure you never want to reactivate it. You can delete your account by sending an email to [hermes@hermes.health](mailto:hermes@hermes.health) with the subject heading 'Account deletion'.

Where we process registration data, we do this for as long as you are an active user of our Apps and Services and for 6 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you

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direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract, a project or research study, we keep the data for 6 years from your last interaction with us.

**YES WE DO USE COOKIES OR OTHER SIMILAR TECHNOLOGIES. HERE IS SOME MORE INFORMATION**

A cookie is a small file of letters and numbers that we put on your computer or other Device if you agree. Pixels are small blocks of code on web pages that do things like allow another server to measure viewing of a webpage and often are used in connection with cookies.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and generally improving your experience of our Apps and Sites. Cookies make the interaction between you and our Apps and Sites faster and easier. We use cookies to distinguish you from other users of the Apps, our Sites or Services. This helps us to provide you with a good experience when you use the Apps or browse any of our Sites and also allows us to improve the Apps, our Sites and Services. Cookies and things like local storage also help us authenticate you to deliver personalized content.

We have outlined below the individual cookies we use and why we use them:

<b>COOKIES</b>	<b>NAME PURPOSE</b>
.hermes.health	Session

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the service. Please refer to your browser or Device's help material to learn what controls you can often use to remove or block cookies or other similar technologies or block or remove other data stored on your computer or Device.