

Privacy Policy

09.04.2018

MiSANTO AG, Thundorferstrasse 194A, 8500 Frauenfeld, Switzerland („**MiSANTO**“, „**We**“ or „**Us**“) places great emphasis on the protection of your personal data and collects, processes, stores and uses your personal data only in accordance with the principles of the Swiss Federal Act on Data Protection (“**FADP**”) and the European General Data Protection Regulation (“**GDPR**”) and in accordance with the principles described below.

You as a User of our products and services (“**User**” or “**You**”) are likely to share personal data with us if You access and use our products or services. In this Privacy Policy we want to explain to You what happens with your personal data in a transparent, detailed and easily understandable manner.

Please read this Privacy Policy carefully. If You wish to install, use, register to or otherwise access any of our services provided, You must agree to this privacy policy and grant us an explicit and informed consent to the collection, use and processing of your personal data required for the purposes of the service contract between You and us in accordance with this privacy policy.

How do MiSANTO’s products and services work?

MiSANTO offers You wearable devices (“**Wearables**”) which are interconnected with an App (“**MiSANTO-App**”). You need to download and install the MiSANTO-App on your mobile device and configure your wearable device with your MiSANTO-App. Once You have installed and configured these items and are ready to use our products and services You will be able to upload and share any health-related information relevant to You on the MiSANTO-App. While uploading any health-related information (including scanned health-related documents) such information will be automatically de-identified by encryption making any personally identifiable information non-readable already on your mobile device. **Only You will have the key to re-identify such data. All of your health-related data remains under your control.** With the MiSANTO-App, You are free to share your health-related data with whomever You trust. You can also entitle your personal doctor to share health-related data pertaining to You directly over the MiSANTO-App. We store your de-identified data with an external cloud provider (Google-Cloud operated by Google Inc. California, USA). In addition, if You wish so, we may refer You to medical practitioners for medical consultations. We may also use your de-identified data for data analytic purposes to monitor and detect health-related risks and unusual

developments. If we detect health-related risks or unusual developments, we can provide You with feedback-notifications.

Information We Collect

When using or accessing our products and services for the first time, You provide certain personal data to us yourself, such as your name, address, e-mail-address, birth date, gender to open your user account. When using our products and services and uploading your health-related data, we only record de-identified data of You (i.e. encrypted and not visible to us). We only keep the following data visible to us: Birth date, gender and age. We may in exceptional case re-identify your health-related data, if You expressly request us to do so (e.g. because You are unable to find/use your key to re-identify your data).

Protection, Processing and Use of Personal Data

We use your personal information to provide the services to You and to comply with our legal obligations. We take appropriate precautions to restrict access to your personal data to only those who need to know that information and maintain appropriate measures to protect the information from loss, misuse or inadvertent destruction.

If we provide a service in cooperation with third parties or via third parties, we will only disclose de-identified data to such third party, provided such disclosure is necessary for the provision and processing our products and services. Further, we may disclose de-identified data to third parties who process data on our behalf, e.g. for data consolidation, storage and customer data management and to authorities and auditors in connection with legal and regulatory obligations.

We will retain your data (de-identified and/or re-identified) in accordance with applicable data protection laws for as long as it is needed.

We use de-identified data for data analytics purposes. We use such analytics to monitor and detect health-related risks or unusual developments. If we detect health-related risks or noteworthy abnormalities, we can provide You with feedback-notifications. You may choose to opt-out from receiving such feedback-notifications with a message to info@misanto.ch.

We may also support You in receiving medical consultation services by medical practitioners cooperating with MiSANTO. If You request such medical consultation services, we will provide You with direct contact data of a medical practitioner and refer You to him. You will enter into a direct consultation agreement with the medical practitioner. Any sharing of your data with the medical practitioner will be governed by a

separate agreement between You and the medical practitioner. We assume no responsibility for the medical practitioner collecting, storing and processing your data.

Data Security

The security of your data is important to us. We follow adequate technical and organizational standards to protect the data submitted to us.

Security of data transferred

Please note that data transferred through networks such as the Internet may be accessible to third parties. We cannot guarantee the confidentiality of any communication or material transmitted by You via such open networks. When disclosing any personal information via an open network, You should be aware that your data is potentially accessible to others and consequently can be collected and used by others without your consent. Your data may be lost during transmission or may be accessed by unauthorized parties. Please use other means of communication if You think this is necessary or prudent for security reasons.

Web-Analytics, Cookies and News

If You use the MiSANTO-App or if You visit our Website, we may use cookies or similar technologies to analyze trends, administer our website, track users' movements and to gather demographic information about the user base as a whole. You can control the use of cookies at the individual browser level. If You choose to disable cookies, it may limit your use of certain features or functions on our website or service.

We use mobile analytics software to better understand the functionality of our mobile MiSANTO App on your phone. This software may record information such as how often You use the application, the events that occur within the application, aggregated usage, performance data and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable data of You.

We may send You feedback-notifications from time-to-time to update You about medical developments and to notify You about health-related risks or abnormalities detected. You may opt-out from receiving such feedback-notifications with a message to info@misanto.ch.

Access to Personal Data

Upon request, MiSANTO will provide You with information about whether we hold or process any of your personal data. To request this information, please contact us at info@misanto.ch. You may also access, correct or request deletion of your personal information by contacting us. We will respond to your requests within a reasonable timeframe.

We may retain your data for as long as your account is active or as needed to provide You services, comply with our legal obligations, resolve disputes and enforce our agreements.

Changes

We reserve the right to change this data privacy policy from time to time. If we intend to do so, we will notify You and ask You to accept such updates.