

Privacy policy for the neotiv app

Status: March 2022

In the following, we inform you about the processing of personal data when using the neotiv app ("**App**"). Personal data is all data that can be related to you personally, for example your e-mail address.

1. responsible

1.1 The responsible party pursuant to Art. 4 (7) of the General Data Protection Regulation ("**GDPR**") for the App is neotiv GmbH, Hegelstraße 19, 39104 Magdeburg, Germany. You can reach our data protection officer at security@neotiv.com or our postal address with the addition of "The Data Protection Officer".

1.2 This privacy policy does **not** inform about the handling of information by the respective researchers or research institutes using the app for scientific studies. Insofar as personal data is processed by these researchers or research institutes, the respective responsible parties for this data processing are always the researchers or research institutes named for the research project. You will therefore also inform the respective researchers or research institutes about their data processing.

2. processing of personal data

2.1 When using our app, we collect the necessary personal data described below to enable the use of the functions.

2.1.1 Email addresses & usernames

2.1.1.1 Free citizen research

We need your email address and username to enable you to use our app and to ensure that you can always identify yourself as the person using the app (Art. 6 para. 1 lit. b DSGVO).

2.1.1.2 Other scientific studies

If you participate in any other scientific study (anything but citizen science), we **do not** collect your name and email address, but instead use pseudonymization, the resolution of which (assignment of pseudonym and person) is only possible for the respective institution conducting the study and responsible for data sovereignty (see section 1.2).

2.1.2 In order for us to be able to send you notifications via the app, your device identification number is read, translated into an InstanceID and transferred to the cloud messaging service Firebase. The

service stores the InstanceID hashed (as a token) in its database in order to be able to deliver the notifications to your end device without us being able to identify you directly.

2.1.3 We process personal data that relate to your physical or mental health and from which information about your state of health emerges (for example, questions about your pre-existing conditions) for scientific research purposes (Section 27 (1) BDSG in conjunction with Article 9 (2) h DSGVO). Our app is intended to provide as many researchers and research institutes as possible in the research field of cognitive diseases (e.g. dementia research) with easy and permanent access to you as a study participant and thus make a valuable contribution to research. At the same time, our app is intended to make it easier for you to participate in scientific studies in this research field. The research projects serve to improve the health of the population and enable future therapy options in the field of cognitive diseases.

2.1.4 In addition, we may process other personal data that are not health data within the scope of the respective scientific research purpose of the respective research study (Art. 6 para. 1 lit. b DSGVO). Whether we process these personal data depends on whether these data are required for the respective research study. For example, this may be information about your lifestyle habits or your age.

2.1.5 In addition, we collect the following data to provide the functions of the app and to ensure its stability and security (Art. 6 para. 1 lit. f DSGVO):

- Date and time of the app usage of the respective user
- Time zone difference from Greenwich Mean Time
- Content of the request (concretely called content within the app)
- amount of data transferred in each case
- Operating system and its interface, including language setting
- Version of the app

2.1.6 The app uses a cookie-like technology. Insofar as personal data is involved, this is done in order to make the app available to you (Art. 6 para. 1 lit. b DSGVO). In addition, we may analyze your use of the app in order to improve the app as a whole and for further research studies (Art. 6 para. 1 lit. f DSGVO). No health data is processed in this context.

2.1.7 In addition, we process your answers to our questions about your main interests and your use of the app (according to section 1.5 of our GTC) in order to improve the app (Art. 6 para. 1 lit. f DSGVO). Again, this does not include health data.

2.2 When downloading the app, the technically required information stored in the operating system of your cell phone is transmitted to the app store, i.e. in particular user name, email address and customer number of your account with the respective app store provider, time of download and the individual device identification number. We have no influence on this data collection. Therefore, we are not responsible for it. We process the data only insofar as it is necessary for downloading the app to your end device (Art. 6 para. 1 lit. b DSGVO).

2.3 If you contact us (for example, via our contact information mentioned above, cf. section 1.1), we process the personal data you have provided (i.e., for example, your name and email address) in order to answer your questions (Art. 6 para. 1 lit. b DSGVO). In the case of a scientific study, support is provided via the email address of the stored study coordinator in order to maintain pseudonymization.

2.4 We do not perform automated decision making or profiling.

3. Recipient of the data

3.1 We transmit your submissions in the context of a research study to the respective researchers or research institutions conducting the study (Section 27 (1) BDSG in conjunction with Article 9 (2) (h) DSGVO, insofar as health data are concerned, otherwise in accordance with Article 6 (1) (b) DSGVO).

3.2 We transmit your device ID to the cloud messaging service "Firebase Cloud Messaging" (our order processor in the USA) in order to generate an InstanceID (see section 2.1.2). Google's Firebase relies here on the EU Commission's standard data protection clause and thus undertakes to comply with the same level of data protection of the EU GDPR. To obtain a copy of this, please contact our data protection officer (item 1.1). Here, the service records all interactions with the end device that are related to the app. These interactions are referred to by Firebase as events. neotiv has defined the following events:

- app_clear_data
- app_remove
- app_update
- first_open
- notification_dismiss
- notification_foreground
- notification_open
- notification_recieve
- os_update
- screen_view
- session_start

Different metadata is stored for each event:

- Activity timestamp
- Number of views per user
- Operating system
- Mobile device type
- the respective value
- Location tracking (countries only)
- demographic composition (gender distribution, age groups)

The deletion of InstanceID will be done as soon as an account is deleted, which also breaks the link to a specific device and we guarantee Art. 17 GDPR (see also section 5.1).

3.3 The App sends anonymous error reports to the Service Visual Studio App Center from Microsoft (<https://appcenter.ms>). The following data is transmitted:

- Date,
- Time,
- Operating system,
- Smartphone Model,
- Language settings,
- Anonymized ID,
- Screen orientation,
- Free RAM,
- Free memory,
- Device rooted,
- App version,
- and error information.

Personal data will not be transmitted.

The legal basis for data processing is Art. 6 para. p1. 1 lit. f DSGVO. Our legitimate interest follows from the purposes for data collection listed above. In no case do we use the collected data for the purpose of drawing conclusions about your person.

4. Storage period

4.1 We process the personal data only for as long as it is necessary for the stated purposes in each case and then delete it. In the case of statutory retention periods, we restrict the storage and processing to this extent. The retention periods for research studies are determined separately by the respective research institute conducting the study.

4.2 We anonymize your health data after completion of a citizen research study before we process it for scientific research purposes, in accordance with Section 27 (3) Sentence 1 BDSG, as soon as this is possible according to the purpose of the research (unless your legitimate interests conflict with this).

4.3 Before we anonymize the health data in accordance with Section 4.2, we always store the respective characteristics separately, with which individual details about your personal and factual circumstances can be assigned.

5. Your rights

5.1 You have the following rights against us, regarding the personal data concerning you, in accordance with the legal provisions:

- Right to information
- Right to rectification and cancellation
- Right to restriction of processing
- Right to object to processing
- Right to data portability.

Please note that these rights may be limited due to Section 27 (2) BDSG.

5.2 You also have the right to complain to a data protection supervisory authority about the processing of your personal data in our company.

Supervisory Authority Saxony-Anhalt:

Representative for data protection

Address: Leiterstraße 9, 39104 Magdeburg, Germany

Postal address: P.O. Box 1947, 39009 Magdeburg, Germany

Web: datenschutz.sachsen-anhalt.de

E-mail: poststelle@lfd.sachsen-anhalt.de

Phone: +49 391 81803-0

Freecall: 0800 9153190 (DTAG fixed network)

Fax: 0391 81803-33