

## Data protection agreement for the neotivTrials app

Last edited: July 2022

In the following, we inform you about the processing of personal data when using the neotivTrials app ("**App**") in terms of the European General Data Protection Regulation ("**GDPR**"). Personal data (Art. 4 (1) GDPR) is any data that can be related to you personally, for example your email address or other data that can lead to identification.

### 1. Preamble

The interactive software application neotivTrials is used to test and record the memory function of study participants. In addition, further information can be collected from the study participants via digital questionnaires in the app. The data collected in this way can be accessed via a web portal connected to the app and provided to (contractually) specified party/parties.

### 2. Data Controller and Data Protection Officer

2.1 The controller according to Art. 4 (7) GDPR for the processing of your personal data in the app is neotiv GmbH, Hegelstraße 19, 39104 Magdeburg, Germany ("**we**").

You can reach our data protection officer at [security@neotiv-trials.com](mailto:security@neotiv-trials.com) or our postal address with the addition "The Data Protection Officer".

2.2 This privacy policy does **not** inform about the handling of information by the respective researchers or research institutes that use 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. The respective researchers or research institutes will therefore also inform you about their data processing.

### 3. Processing of personal data

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

#### 3.1.1 Email addresses & user names

- Email (verified via so-called double-opt-in)
- Password (encrypted)

#### **3.1.1.1 Citizen Science**

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 (1b) GDPR).

#### **3.1.1.2 Crowd-sourcing platform study**

You will be assigned a pseudonymized email address by the crowd-sourcing platform. There is no legal reason on the part of neotiv to dissolve this pseudonym. The fiduciary management is subject to the crowd-sourcing platform. The app transmits the initial password to the specified email address. Furthermore, we process the ID assigned to you by the crowd sourcing platform to ensure the study assignment.

#### **3.1.1.3 Other scientific studies**

If you take part in another scientific study (everything except citizen science), we do **not** collect your name and email address, but instead use pseudonymization, the resolution (assignment of pseudonym and person) of which is only possible for the respective institution that conducts the study and is responsible for data sovereignty (see section 2.2).

#### **3.1.2 Processing of health data**

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 (German Federal Data Protection Act) in conjunction with Article 9 (2h)). 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 should 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.

#### **3.1.3 Scientific data**

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

### **3.2 Download and registration**

When you download the app, the technically required information is transmitted to the operator of your app store, i.e. in particular your email address, your ID at the respective app store provider, the time of the download and the individual identification number of your terminal device. We have no influence on this data collection. Therefore, we are not responsible for it.

To use the app as intended, you must create a user account in the app after downloading it. To open and manage the user account, and to ensure that you are the person using the app, we collect and process the following personal data:

- (a) your email address (verified via so-called double Opt-In)
- (b) your name (if you provide this name in order to be addressed personally within the app)
- (c) a password (encrypted)
- (d) backup code (in encrypted form, for identification in case of support requests)

The processing of your personal data described in this section takes place within the scope of your usage agreement with us for the use of the app for its intended use. The processing is based on your consent in conjunction with **Article 6 (1a) GDPR** and **Article 9 (2a) GDPR**.

We delete the personal data described in this section immediately after you have deleted your customer account.

### **3.3 Usage of the App**

The intended use of the app includes the performance of certain tests to test your memory performance. For the purpose of conducting tests and evaluating the related results, we process the following personal data from you:

- (e) information about your period of use

- (f) information about your age, pre-existing conditions, acute illnesses, lifestyle factors, or sleep patterns, if you provide information about them
- (g) the date and time you performed a test
- (h) the length of time it will take you to complete a test
- (i) your input and answers during the test
- (j) information on your personal feelings in connection with the performance of a test, if you provide details in the respective free text field
- (k) evaluation results for your individual test

We process the personal data referred to in this clause on the basis of your consent in conjunction with **Article 6 (1a) GDPR** and **Article 9 (2a) GDPR**.

### **3.4 Ensuring technical functionality**

In addition, we process the following personal data from you in order to be able to permanently guarantee the technical functionality of the app, the user-friendliness and the further development of the app:

- (l) date and time of the respective user's app usage.
- (m) time zone and time zone difference to Greenwich Mean Time.
- (n) content of the request (concretely called content within the app).
- (o) amount of data transferred in each case.
- (p) operating system (Version, Security Updates) and its interface, including language setting.
- (q) version of the App.
- (r) error messages that occurred during the execution of the App.
- (s) a track trace (previous interactions before the error).
- (t) date and time of any error that occurred.
- (u) device information:
- (v) identification number of the end device on which the app is used (anonymized, needed to be able to assign errors to the device).
- (w) battery status and temperature.
- (x) last restart of the device.
- (y) free memory / RAM.
- (z) connection type (Wifi or mobile data).
- (aa) preferred language.

- (bb) device orientation (landscape or portrait).
- (cc) screen resolution and screen size.
- (dd) IP address (will be processed shortened).

The app uses so-called log files and cookie-like technology to process the personal data mentioned in this section. This means that small text files are stored on your terminal device without causing any damage or transferring any content to your terminal device.

In addition, we may ask you questions about the way you use the app and evaluate your answers to our questions in order to develop the app as user-friendly as possible.

We process the personal data mentioned in this section based on your consent in conjunction **with Article 6 (1a) GDPR** and **Article 9 (2a) GDPR**.

We will delete the personal data described in this section no later than 30 calendar days after the end of your study or no later than 30 calendar days after you have deleted your customer account.

### **3.5 Contacting**

If you contact us (for example, via our contact information above, cf. item 2), we process the personal data that results from your means of communication and that you provided when contacting us (i.e., for example, your name and email address and, if applicable, your backup code) in order to answer your questions. This data processing is based on Art. 6 (1b) GPDR if your questions relate to the usage contract concluded between you and us via the app and on Art. 6 (1f) GPDR if no contractual relationship existed, exists or is in the offing between you. Our legitimate interest in this case is to answer your questions to your satisfaction.

We delete the personal data described in this section no later than 30 calendar days after the last contacting.

### **4. No automated decision making**

We do not perform automated decision making or profiling.

## 5. Recipients of the data

We transmit personal data to the extent described in section 3.3 to the client of the study, as well as described in section 3.1.1.2 to the crowd sourcing platform.

## 6. Your rights

You have the following rights with respect to personal data concerning you in accordance with the legal provisions:

- (ee) Right of access
- (ff) Right of rectification and erasure
- (gg) Right to restriction of processing
- (hh) Right to data portability

Insofar as the processing of your personal data is based on consent, you may revoke your consent at any time. We will then no longer process the data in question. However, the lawfulness of our data processing up to the time of the revocation of consent remains unaffected by this revocation.

In addition, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you that is carried out on the basis of Art. 6(1e) or (1f) GDPR.

To protect your rights you can write an email to [security@neotiv-trials.com](mailto:security@neotiv-trials.com). The data protection officer will deal with your request immediately.

You also have the right to complain to a data protection supervisory authority about the processing of your personal data in our company. The data protection supervisory authority responsible for us is the supervisory authority of Saxony-Anhalt. However, you can also contact any other data protection supervisory authority.

Supervisor Authority Saxony-Anhalt:

State Data Protection Commissioner

Visiting address: Leiterstraße 9, 39104 Magdeburg

Postal address: Postfach 1947, 39009 Magdeburg

Web: [datenschutz.sachsen-anhalt.de](http://datenschutz.sachsen-anhalt.de)

Email: [poststelle@fd.sachsen-anhalt.de](mailto:poststelle@fd.sachsen-anhalt.de)

Tel.: +49 391 81803-0

Free phone: 0800 9153190 (DTAG fixed network)

Fax: 0391 81803-33