

**LAST UPDATED: 10/12/2022**

# **BSMART CHART APP PRIVACY POLICY**

Bohemian Smartlytics wants you to be familiar with how we protect your privacy. This Privacy Policy describes our best practices in connection with personal information that is collected through the BSmart Chart App.

## **About BSmart Chart App**

The BSmart Chart App is developed through a collaboration among experienced doctors and researchers with the help of patients. We have developed the BSmart Chart App to empower people living with HIV (PLWH) to gain control over their own health and to improve patient care and health outcomes.

## **Functionality of the BSmart Chart App**

BSmartChart App puts HIV patients' interest at the centre of disease management with features and functionalities beyond imagination. A first of a kind app that supports the optimization of HIV therapy in four ways:

- 1) **Monitoring:** by monitoring your parameters in day-to-day life, you are assisted in making better-informed therapy decisions.
- 2) **Connect:** by connecting with your healthcare professional and share your data reports for discussion of therapy.
- 3) **Therapy Compliance:** by receiving motivational triggers, feedback on your current therapy status and rewards. For staying motivated by sticking to your therapy, and therefore increasing therapy compliance.
- 4) **Support Engagement:** by improving engagement with healthcare professionals and support systems to drive ART adherence and social support.

BSmart Chart App will enable you to:

- Connect with your clinician in real time, notify them of changes, and share your HIV health and well-being status
- Visualise your HIV health and well-being and monitor your progress overtime.
- Express your views freely, speak out loud and let your voice be heard
- Track your adherence, nutrition, social, cognitive, emotional and quality of life
- Become a mentor by challenging yourself and the opportunity of winning a small gift
- Take charge of your HIV by getting individualized evidence-based information
- Set appointment reminders
- Examine your metabolic and cardiovascular risk scores
- Receive daily motivational quotes, an inspiration for the day

- Manage your HIV medication and keep track of your medications
- Set goals and build knowledge and skills
- Gain knowledge and skills about HIV disease via quizzes and interactive exercises
- Access up-to-date information depending on your needs
- Support engagement through daily discussions and connect with others around the globe.

### **Storage of Your Personal Information**

To protect your privacy, the information processed by BSmart Chart App is stored on a secure cloud-based server, with dual encryption, which cannot be accessed by others. The BSmart Chart App does not process your name and contact details, but a unique identifier only.

### **Key within the BSmart Chart App**

- **Connect with your clinician and share your data and reports.** BSmart Chart provides you the option to connect with your healthcare professional and share your data reports for discussion of therapy. After setting up your BSmart Chart App account, you can invite your clinician to connect by entering their contact details (email and phone number) and upon acceptance your clinician can visualise your reports via the app. Please note that you can also be invited by your healthcare professional to download BSmart Chart app.
- **Research and statistical analysis and improving patient care.** Information collected through the app will be used for research and statistical analysis. To protect your privacy, BSmart Chart App will automatically replace your unique identifier with another identifier and subsequently transfer your information to a safely secured server operated on behalf of Bohemian Smartlytics Limited (BSL), complying with GDPR and other data privacy laws and regulations. Data will only be accessed by dedicated staff at BSL for research and analytics purposes only. BSL will provide the results of such research and analytics in aggregate format. Only results will be provided and in no event the underlying data. You may opt out of processing of your data for research and statistical analysis in the App under Profile Settings (Settings→My Consent).

For more information about how your information is processed and for what purposes, please read the privacy information below.

## **PROCESSING YOUR INFORMATION**

### **Information processed to provide the functionality of the BSmart Chart App**

In order to provide the functionalities of the BSmart Chart App, the BSmart Chart App will need to process your medical and health related information (e.g., medicine used, emotional symptoms, quality of life, viral load, hospital appointments, etc.). You can manually insert this information in the BSmart Chart App in My Survey section.

To protect your privacy, BSmart Chart App does not request you to provide your name and contact details but processes a unique identifier only. Your information is further stored on a secure certified server, password protected in an encrypted format, and accessed by trained and dedicated staff for research purposes at BSL through a two-step verification process. These data will also be made available to your healthcare providers through a consenting procedure within the app,

### **Personal information**

The following personal information is stored on your local device and our secure server:

### **Demographics**

1. Email
2. Date of birth
3. Sex
4. Ethnic origin
5. Country of birth
6. Country you live in
7. City you receive care
8. Who you live with?
9. Type of accommodation
10. Your highest educational qualification
11. Year and month of your HIV diagnosis
12. Mode of HIV transmission
13. How you pay your care
14. Most current viral load
15. Most current CD4 count
16. Your responses to self-reported "Patient Adherence" in My Survey (14 questions)
17. Your responses to "Cognitive Problems" in My Survey (3 questions)
18. Your responses to "Physical Symptoms" in My Survey (10 questions)
19. Your responses to "Metabolic Syndrome" in My Survey (5 questions)
20. Your responses to "Quality of Life" in My Survey (3 questions)
21. Your responses to "Depression" in My Survey (3 questions)
22. Your responses to "Treatment Preferences" in My Survey (2 questions)
23. Your responses to "Patient Satisfaction" in My Survey (10 questions)

24. Your responses to "Cardiovascular" related questions in My Survey (8 questions)
25. Your responses to "Vaccination" in My Survey (1 question)
26. Your responses to "HIV and Non-HIV Medications" in My Survey (4 questions)
27. Your responses to "Sexual and Reproductive Health" in My Survey (4 questions)
28. Your responses to "Your Information Needs" in My Survey (2 questions)
29. Use of medication
30. Medical appointments

### **Option to process de-identified information for research and statistical analysis**

During the set-up, we will ask whether you want to give the BSmart Chart App permission to share your information with BSL for research and statistical analysis purposes in a safe and secure manner. If you skip this step, we will assume that your data can be processed for research and statistically analysis purpose however, you can disable this function at any time.

If you give your permission, BSmart Chart App ensures this happens in a safe and secure manner by de-identifying the information further. Sensitive information, such as birth date will be automatically replaced by your birth year, and your unique identifier will automatically be replaced with another unique identifier. BSmart Chart App will subsequently transfer your de-identified information to a safely secured server operated on behalf of BSL by a certified GDPR compliant cloud storage server. The information can only be accessed by dedicated staff BSL for research and analytics purposes only.

### **Use of aggregate information**

BSL will provide the results of such research and analytics in aggregate format only. In no event will these results contain personal information and BSL will in no event provide the underlying data to third parties. For example, the analytical insights may be shared with health insurers, pharmaceutical companies and (academic) hospitals to further contribute to the improvement of patient care. Further use of aggregate information includes preparing aggregated trend reports on how the functionality of BSmart Chart App is used by patients, so that we can improve BSmart Chart App.

### **LEGAL BASES**

- BSmart Chart App processes your information, because this is necessary to provide you with the functionalities of the App. The processing is therefore based on contractual necessity.

- As your information qualifies as medical and health related information, BSmart Chart App will ask for your explicit consent to process your health information.
- BSmart Chart App will only connect with your healthcare professional with your explicit consent, which consent you can withdraw through BSmart Chart App settings at any time.
- BSmart Chart App will only make your information available to pharmaceutical, biotech and medical device companies for clinical trial purposes with your explicit consent, which consent you can withdraw through BSmart Chart App settings at any time.
- BSmart Chart App will transfer your information for purposes of research and statistical analysis only with your explicit consent, which consent you can withdraw through BSmart Chart App settings at any time.

### **SECURITY OF YOUR INFORMATION**

Note that your information will be stored locally on your device in an encrypted format and on a certified GDPR compliant cloud storage server, meaning that even if someone unlawfully gains access to your information, the information will not be readable to them.

The information on BSmart Chart App cannot be accessed by others. During the set-up of BSmart Chart App, the App will prompt you to set a 5-digit passcode to ensure that unauthorized persons cannot access BSmart Chart App and the information stored therein, even if you lose your device. The App will not allow you to set a simple password that can be easily guessed by others, such as 00000 or 12345.

Your information is always encrypted when it is transferred or in transit, including when your connected to your health care professional through BSmart Chart App, or when information is transferred to BSL.

If you give permission to connect with your healthcare professional, this connection between your clinician and BSmart Chart App will be enabled by a secure cloud storage server. We have entered into strict contractual arrangements with the service provider to ensure this connection happens in a safe and secure manner.

Your information is also encrypted when it is transferred to BSL. BSL is GDPR compliant with appropriate security standards to process the de-identified information and to perform the data analysis as described above. For more

information about BSL and its security measures, please contact via [support@bsmartlytics.com](mailto:support@bsmartlytics.com).

### **Your rights regarding information stored on your device**

You can access, correct and update your information collected by BSmart Chart App through the BSmart Chart App itself. Please note that if you update information from BSmart Chart App, this will only update the information stored locally on your device.

### **Your rights regarding information processed by BSL**

Please send an email to [app@bsmartlytics.com](mailto:app@bsmartlytics.com) if you wish to remove your information from the secure cloud based server, or request to access, correct, or object to the processing of information, or if you would like to request to receive a copy of your information for purposes of transmitting it to another company or foundation (to the extent these rights are provided to you by applicable law). You will be requested to provide certain information to enable de-identification.

### **RETENTION PERIOD**

The information is stored locally on your device and on cloud storage server and will remain on your device and server until you uninstall BSmart Chart App, remove all information through your settings and/or request removal of all information within cloud storage server.

The de-identified information will be processed for research and analytics purposes on the secured platform for as long as BSL operates the BSmart Chart App and performs its statutory objective of improving patient care.

We will annually ask for renewal of your explicit consent to continue processing your information for analytical and research purposes.

### **USE OF BSMART CHART APP BY MINORS**

BSmart Chart App is not directed to individuals under the age of sixteen (16), and we do not knowingly collect information from individuals under 16. However, minors are only permitted with the explicit agreement of a parent/guardian. A scanned copy of this written consent must be sent to [app@bsmartlytics.com](mailto:app@bsmartlytics.com). Parent/guardian should declare that they are entitled to submit legally binding declarations in the name of the minor.

### **UPDATES TO THIS PRIVACY POLICY**

The "LAST UPDATED" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on BSmart Chart App.

## **CONTACTING US**

BSmart ChartApp, is a product of BSmartlytics Limited located at Unit 3, Clerkin Building, 2 Hollands Road, Haverhill, CB9 8PP, United Kingdom. The company is responsible for collection and use of your information under this Privacy Policy.

If you have any questions about this Privacy Policy, please contact us at [app@bsmartlytics.com](mailto:app@bsmartlytics.com), or the address provided above.

Because email communications are not always secure, please do not include sensitive information in your emails to us.

You may also lodge a complaint with an EU/EEA data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs.