

Privacy Policy for CalproSmart

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Privacy and protection of your personal information is very important to Calpro. This privacy policy (“the Privacy Policy”) explains how we protect and process your personal information. We may revise this Privacy Policy at any time. If we make any changes in the Privacy Policy, we will notify you by sending you an SMS, or email with details of the change, or we will notify you of the change when you next start the CalproSmart App (“the App”). The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App.

Please note that the Privacy Policy does not apply to services provided by our business partners or other companies that Calpro does not own or operate. For information on how other providers of products or services process personal information, please consult their respective privacy policies.

1. ROLES AND PURPOSE

Here at Calpro we take your privacy seriously and will only use your personal information to administer your account and to provide the App and services you have requested from us (“the Services”). We will not process any personal information about you unless you have been registered as a user of CalproSmart by your health care provider.

CalproSmart Test Kit is provided to you, for the purposes of providing medical test results which is to be processed and transferred to your health care provider through the use of the App. Although the health care provider did not design the App nor the CalproSmart Portal, they are acting as the data controller because they determined that the App would be used to forward such test results to them.

Calpro is the data processor for the personal information about you, including test results and other medical information as listed below in Section 2.3. The purpose of processing your personal information is divided into two separate matters:

- to enable your use of the App, and

- to make it easier for you to communicate your test results to your health care provider and monitor your condition via the App.

2. THE PERSONAL INFORMATION WE PROCESS

2.1 How is the personal information processed?

When you are registered as a user you are required to submit certain personal information to your health care provider. Calpro will obtain this information from your health care provider.

While using the App you will from time to time and with the agreement of your health care provider, provide us with the medical test results obtained via the CalproSmart Test Kit and the App. This is sensitive personal information and will be stored and processed by Calpro for the purpose of monitoring a medical condition which is the reason for why your health care provider recommended the use of CalproSmart.

The submission of personal information is voluntarily, and you may at any time withdraw your consent(s) to our processing by contacting Calpro (see section 8), but your submission and our processing of the personal information is a prerequisite for using the App and Services, and to enable its functionality.

2.2 Personal Information we process and the purpose for processing

The personal information we process is your:

- Name
- Address (street/postcode/city)
- Email address
- Phone number
- Date of birth

The purpose of processing this personal information is to enable identification and communication between you and your health care provider.

2.3 Sensitive Personal Information

We also process sensitive personal information related to your health:

- CalproSmart test results
- Concentration of calprotectin
- Classification of results and threshold
- Test frequency
- Sampling time
- Patient ID

The purpose of processing this sensitive personal information is to enable communication of the relevant medical information between you and your health care provider, and for enabling you and your health care provider to monitor your condition.

2.4 Non-Personal Information

- Gender
- Phone brand, model and name
- App version, Reader version, Batch number and expiry date
- Choice of language
- Health Care Provider

Collectively the information described in section 2.2, 2.3 and 2.4 is hereinafter called “Personal Information”.

We may also collect and store anonymous and non-Personal Information such as traffic statistics, device types etc. from unregistered visitors or users of our Services. That data is not identifiable to any individual.

3. LEGAL GROUNDS FOR PROCESSING

3.1 The legal grounds for processing your Personal Information in connection with your use of the App

We use your explicit consent as grounds for processing your Personal Information, for us to enable your use of the App.

When downloading the App we will ask you to accept the Privacy Policy and our processing of your Personal Information. In addition we will ask you to accept Calpro's license terms, the EULA. Thus, when starting your use of the App and Services you have accepted Calpro's processing of Personal Information subject to this Privacy Policy.

If you consent to us processing your Personal Information for the purpose of enabling identification and communication of the relevant medical information between you and your health care provider, and for monitoring purposes, please tick to confirm:

I agree

You may at any time withdraw your consent, or abstain from submitting the Personal Information requested, by contacting Calpro. Please see contact details below in section 8. However, please note that the consequence may be that the App and Services will not function properly.

We guarantee that your Personal Information is processed in accordance with the Norwegian Data Protection Act (LOV-2000-04-14-31), and the new General Data Protection Regulation (EU 2016/679) entering into force May 2018.

3.2 The transfer of your data to your health care provider

You are using the App and the CalproSmart Test-Kit to communicate and transfer your test results to your health care provider. In order to facilitate such transfer, we will be processing personal information about your health. We will ask for your explicit consent to such processing of personal information.

If you consent to us transferring sensitive personal information to your health care provider please tick to confirm:

I agree

Your health care provider will obtain the necessary grounds for their processing of your Personal Information. Calpro is acting as your health care provider's data processor, and we will enter into a data processing agreement with your health care provider which will cover such transfer and state the terms that our processing shall comply with.

Furthermore, your health care provider may need to integrate your personal information with other data systems they operate. This is of course provided that the health care provider and Calpro agrees on suitable control and protection of that data.

If you consent to the integration of your Personal Information with other systems that your health care provider operates, please tick to confirm:

I agree

3.3 Sharing of personal information

You hereby accept that Calpro may share your Personal Information with service providers, and partners who assist with some of the processing and storage ("Sub-processors"), provided that Calpro has entered into Data Processing Agreement with such Sub-processors, wherein the Sub-processor undertakes to process your Personal Information with the same level of security as Calpro.

If you consent to us transferring your Personal Information to Sub-processors for the purposes above, please tick to confirm:

I agree

Calpro will not disclose any Personal Information to any governmental body, except when necessary to comply with the law or a valid and binding order of a law enforcement agency.

Calpro may update your Personal Information through contact with the health care provider who registered you.

4. HOW WE PROCESS AND USE YOUR PERSONAL INFORMATION

Your Personal Information will be made available to the health care provider which registered you as a CalproSmart user. The Personal Information will be used to facilitate communication between you and your health care provider concerning the medical testing and your condition.

We also use your Personal Information to help us develop, deliver, and improve our App and Services.

Calpro may use anonymized and aggregated data to monitor statistics related to use of our App and Services in order to identify use trends, help design future improvements, and ensure the efficacy and safety of our products and services.

5. WHERE WE PROCESS YOUR PERSONAL INFORMATION

Your Personal Information will be stored on servers which are located at Digiplex, Ulvenveien 89B, 0581 Oslo, Norway

Calpro maintain servers at multiple locations to prevent data loss. Calpro may occasionally temporarily disable servers for maintenance purposes. Back up site is Oslo Science Park, Gaustadalléen 21, 0349 Oslo, Norway.

6. SECURITY OF PERSONAL INFORMATION

Your personal information is transmitted across SSL encrypted connections only.

Only authorized personnel may have access to your Personal Information, and for technical and support purposes only.

We only collect and process the Personal Information that is strictly necessary for the functioning of the App, and only for the period it is necessary, i.e. as long as you are a user of the App.

We recommend you log out of the App and any other Services when not in use to prevent any risk of misuse.

All passwords you provide are encrypted (via a one-way hash) and Calpro have no access to your password. If you forget your password you can request a new one here:

<https://calprosmart.com/accounts/password/reset/> and a link to reset your password will be sent to the email address provided by you when registering.

You should not tell anyone your password, and we recommend that you use a different password from any other site or service. If you suspect that your password may have become known to anyone or your email account is compromised we recommend changing your password.

7. YOUR RIGHTS

7.1 Right to access

You have a right to access and receive a copy of the Personal Information we process about you. Either by access through the App or by contacting your health care provider or Calpro (see section 8 below).

7.2 Right to rectification

You have a right to rectify inaccurate Personal Information. In order to do this you must contact your health care provider or contact Calpro (see section 8 below) and we will correct the information as requested by you.

7.3 Right to be forgotten

Calpro will store your Personal Information until it is no longer necessary in order for the health care provider to provide the treatment. The health care provider is responsible for determining when the processing is no longer necessary, and must notify Calpro. Calpro will delete Personal Information no longer than 2 weeks after receiving notification from your health care provider to delete the Personal Information.

In any event you have the right to delete the Personal Data, or make Calpro delete the Personal Information about you when

- the Personal Information is no longer necessary to obtain the purposes herein;
- you no longer consent to the processing;
- you object to the processing;
- the Personal Data has been unlawfully processed

7.4 Right to restrict processing

You have the right to restrict Calpro's processing of Personal Information if

- you contest the accuracy of the Personal Information;
- the processing is unlawful;
- we no longer need the Personal Information
- you need it in connection with a legal claim;
- you have objected to the processing and are pending the decision

7.5 Right to object

You may at any time object to the processing of your Personal Information. If you do, we shall no longer process your Personal Information.

7.6 Right to data portability

The Personal Information shall be portable, meaning that you have the right to receive your Personal Information in a structured, commonly used and machine-readable format in order to be able to transfer this information to whomever you choose.

7.7 Right to file a complaint

If Calpro, in your opinion, does not comply with this Privacy Policy you have the right to file a complaint to the Norwegian Data Protection Authorities. See <https://www.datatilsynet.no/> for more information.

8. CONTACT CALPRO

All requests to Calpro, including those concerning rectification, erasure or restriction of Personal Information, should use the following contact information:

Telephone number: +47 40 00 42 79

Email address: support@calpro.no

Postal address: Arnstein Arnebergs vei 30, 1366 Lysaker, Norway