

## Privacy Policy

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April 2020

### 1. General Information

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Easy Healthing AG, Im Junker 14, 8143 Stallikon, Schweiz („Easy Healthing“, „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 may be asked to grant us an explicit and informed consent to the collection, use and processing of Your (health-related) personal data required for the purposes of the service contract between You and us in accordance with this privacy policy.

If you have any further questions, we will be pleased to answer them. You may contact us under our address (see chapter 2 Who We are) or You may also send us a message to [info@easy-healthing.com](mailto:info@easy-healthing.com).

### 2. Who We are

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We, Easy Helathing, are responsible for the data processing under this Privacy Policy:

Easy Healthing AG

Im Junker 14

CH-8143 Stallikon

[info@easy-healthing.com](mailto:info@easy-healthing.com)

### 3. How do Easy Healthing’s Products and Services work?

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Easy Healthing offers a mobile application („Easy Healthing-App“). You can download and install the Easy Healthing-App on your mobile device. Once you have installed the Easy Healthing App, you will provide information regarding demographics, health-related questions and a health assessment including your program goal. This information serves as a personal participation risk assessment (health-related questions), reflection and analysis (health assessment) and aggregated analyses (demographics).

Once you have completed the onboarding process, you can access the functionalities of the Easy Healthing App. In a chat format, you receive a weekly new topic including a team challenge. Daily tips in text, pdf and video-format help you to complete your challenge. You enter different information each week, which is used to calculate a team ranking. This information is only visible to other users, if you explicitly share single data points with your team. In addition, your information is used to calculate an aggregated team ranking, as well as the daily team performance visible to your team.

On a monthly basis, you will repeat the health assessment, to support you in holistically reflecting on your health. The results thereof are analyzed on an aggregated and anonymous basis and can be shared with your employer (at least 10 people per subgroup to ensure anonymity).

We host your data on servers in Switzerland.

Furthermore, we will send you periodic emails with offers or information, provided you have consented to this in the onboarding process. You can unsubscribe from these emails at any time with a message to [info@easy-healthing.com](mailto:info@easy-healthing.com).

## **4. Personal Data We process and the Purpose of the Processing**

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Depending on the reason and purpose of the processing, We process different personal data. We collect Your personal data in principle directly from You, e.g. when You go through the onboarding process of the Easy Healthing App and in the course of providing our services to You. In addition, we receive the following information from your employer at registration: email address, office location, department, employer, start date of the program.

### **4.1 We process Your Personal Data when You access or use the Easy Healthing App**

We will process Your personal data in order to provide our services. At registration, we receive information regarding email address, office location and department from your employer. We require this information, among other purposes, to send you a one-time password. Furthermore, you will provide information during the onboarding process regarding language, user name, gender, city, country, weight and age.

During the one-time onboarding process, you will answer a series of medical questions (with yes/no). These do not serve any evaluation or analysis purposes and are not shared, but have the sole purpose of drawing your attention to potential risks in participating in the program. Your program goal is also not shared and serves only your personal reflection.

While you use the Easy Healthing App, we process your weekly data entry to calculate the team rankings and other functionalities of the Easy Healthing App (e.g. medals, performance screens).

We will collect and process personal data which is necessary for the start and processing of the contractual relationship and for the fulfillment of its obligations, or if prescribed by law. Otherwise, We cannot enter into and not continue a contractual relationship with You and You may not be able to use our services and the Easy Healthing App.

### **4.2 We process Your Data to perform Aggregated Analyses**

Your employer receives monthly aggregated analyses regarding the improvement of health factors and participation rates. These are anonymous and filters can only be used if subgroups contain a minimum of 10 people. Hereby, data of the health assessments is used, demographic data, as well as frequency of data entry in the Easy Healthing App.

Your employer may not use this information for monitoring or controlling purposes.

Furthermore, we can use aggregated anonymous data for research, to confirm correlations or to improve our program. These aggregated (and anonymous) insights can be communicated or published by Easy Healthing.

### **4.3 We process Your Data for Communication Purposes**

When you send us questions via the Easy Healthing App or email, we will access Your personal data (email address) to be able to answer You.

Furthermore, we process personal data for advertisement and marketing, in particular for the sending of target-group specific information and marketing messages per email, unless You have opposed to the direct marketing. If, for example, you have signed up for a Newsletter or a messaging service, We process Your contact data, data regarding Your use of the messages (i.e. if You opened an email or downloaded the pictures therein), and data from your program usage in order to get to know You better, to customize our services to You and in general to improve our services. You can oppose to the use of your personal data for direct marketing (e.g. newsletter service) at any time by sending an email to [info@easy-healthing.com](mailto:info@easy-healthing.com).

### **4.4 Other Purposes**

We may use Your non health-related personal data in particular also for the following purposes:

- Customer service
- Customer feedback service
- Questionnaires regarding the app usage
- Providing, administration, securing and personalization of websites, apps, online-offers
- Market research and opinion survey
- Preparation and execution of company mergers, the acquisition or sale of companies or its assets, or similar transactions
- Administration and management of Our IT and other resources
- Accounting, archiving, educational or other administrative purposes
- Verification and compliance with legal obligations including orders of courts and other authorities, compliance and detection and investigation of misuses

## **5. Legal Grounds**

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In general, We use Your personal data: i) to perform our contract with You and Your employer, including aggregated anonymous analyses, ii) upon your expressive and informed consent, if such consent is required by law, iii) to comply with our legal obligations, and iv) for legitimate business interests such as improving our services provided to You and in order to ensure an optimal performance with respect to the contract we have with you.

In particular, We process your data based on the following legal grounds:

- On the basis of contractual relationships entered into between your employer and Easy Healthing and by the license agreement of the Easy Healthing (legal basis under GDPR - if applicable - is Art. 6 (1) lit. b or Art. 9 (2) lit. h);
- To safeguard the legitimate interests of Easy Healthing (legal basis under the GDPR - if applicable - is Art. 6 (1) lit. f). If you have any questions, please contact the contact below;
- For the fulfilment of legal obligations (legal basis after the GDPR - if applicable - is Art. 6 (1) lit. c);
- Insofar as this is legally required on the basis of explicit consent of You (legal basis under the GDPR - if applicable - is Art. 6 (1) lit. a).
- For archival purposes, for scientific or historical research purposes, in particular health studies (legal basis under GDPR – if applicable – is Art. 9 (2) lit. j and Art. 89).

If your consent is required, We will ask You for such consent separately.

## **6. How We retain Your Personal Data**

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We will retain your personal data in accordance with applicable data protection laws for as long as it is necessary for the purposes for which the data is collected, and as long as we have a legitimate interest in keeping personal data, for example to enforce or defend claims or for archiving purposes, analysis purposes and IT security. We also retain your personal data as long as it is subject to a legal retention obligation. After that, We will delete the personal data or de-identify it.

## **7. Data security**

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The security of your data is important to us. We follow adequate technical (e.g. de-identification, record keeping, access restrictions, etc.) and organizational measures (i.e. directives to employees, confidentiality agreements, reviews etc.) to protect the data submitted to Us from unauthorised access, use, disclosure, alteration or destruction.

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.

## **8. Web-Analytics, Cookies**

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If You use the Easy Healthing App or if You visit our Website, we may use cookies or similar technologies to administer our website, to analyze trends, 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 certain 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 Easy Healthing 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.

## **9. Whom We share Your Personal Data with**

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Our employees, contractors or third parties render services to us, e.g. staff or service providers in the support areas such as IT, have access to Your personal data. 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. Where possible, we work with your de-identified data.

Further, we may disclose personal data to third parties who process data on our behalf, e.g. for data consolidation, storage and customer data management (e.g. Server or hosting services provider, financial services provider) as far as this is legally permitted, and to authorities and auditors in connection with legal and regulatory obligations. If We provide a service in cooperation with third parties or via third parties, we will only disclose data to such third party, provided such disclosure is necessary for the provision and processing of our products and services. We will ensure safety of Your personal data when being processed by third parties by choosing appropriate data processors and by entering into appropriate contractual data processing agreements. Our data processors are obliged, to process personal data only on our behalf and according to our instructions.

We process Your anonymous data for aggregated analyses, that are made available to your employer. Furthermore, we can perform additional aggregated, anonymous analyses for internal or external use. The receivers of these analyses can be within Switzerland or abroad.

For the purposes set out in this Privacy Policy and where necessary or legally required, We may share personal data with courts, regulatory authorities, government agencies and law enforcement agencies.

## **10. Your Rights in Connection with the Processing of Your Personal Data**

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You have the right to oppose or withdraw any consent to all processing of your personal data, in particular with regard to direct advertisement (e.g. marketing emails), at any time and without costs. Please note that even after you have chosen to withdraw your consent that such withdrawal will not affect the lawfulness of processing of Your personal data before Your withdrawal. We may be able to continue to process your personal information to the extent required or permitted by law. Upon request, Easy Healthing will provide You with information about whether We hold or process any of your personal data. You are entitled to ask for details of the information We hold about you and how We process it and to receive a copy of your personal data. To request this information, please contact Us under our address indicated above (see 2 Who We are) or send Us an email to [info@easy-healthing.com](mailto:info@easy-healthing.com). You may also have your data rectified or deleted or restrict our processing of that information. You also have the right to object to the processing of your personal data and the right to data portability. You may also lodge a complaint in relation to our processing of your personal data with a local supervisory authority, in Switzerland with the Federal Data Protection and Information Commissioner.

## **11. Changes of the Privacy Policy**

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We reserve the right to change this data Privacy Policy from time to time. If We intend to do so, We will notify You in the event of material changes. The current version of Privacy Policy can be accessed via the following link on our website: <https://www.easy-healthing.com/about>. You can also request the current Terms of Use from Us at any time via email: [info@easy-healthing.com](mailto:info@easy-healthing.com).