Latest Effective Date: 24 February, 2021

MediAR – Data Management and Privacy Policy

This Data Management and Privacy Policy (**Data Management Policy** or **Policy**) regulates and explains the privacy practices of **Business Sprints Pty Ltd.** (registered: Melbourne, VIC 3151, Australia; ABN: 78 141 341 406; hereinafter referred to as **BSPL**) in relation to the Medi AR application and platform's imaging procession license and services(the **Service** or **Services**) provided by **BSPL**.

The Service allows you to upload the result of your medical imaging process (MRI, CT) to the cloud service of MediAR (further referred to as the **application**), where it will be anonymously stored and processed by **BSPL**. The processed image will be available for download for the authorized user only. The application displays the volumetric data of the corresponding medical images in a controllable virtual and/or augmented reality.

BSPL is committed to protecting your privacy. There are some ways that you might interact with **BSPL**, and the information you provide is often necessary for providing the Service or may allow us to improve the Service. Please read this Policy carefully before using the Service.

This Policy is governed by the EU General Data Protection Regulation 2016/679 and the Privacy Act 1988, Australia on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (**GDPR**).

1. **Subject. BSPL** hereby discloses the information on data management, controlling and procession in connection with the Services.

2. **Definitions.**

   2.1. **Personal Data** means any information relating to an identifiable living person, who can be identified mainly by reference to name, address, telephone number, e-mail address, location data etc., but any other information in relation to that person by reference to any identifier which can show any specific to the physical, physiological, genetic, mental, economic, cultural or social factors of that person.

   2.2. **Special Category or Special Data** means personal data about a person's race, ethnic, origin, politics, religion, memberships, genetics, biometrics, sexual life and orientation or health information.

2.3. **Non-Personal Data** means data which cannot be tracked to you and are for statistical purposes or system-related (e.g. name of the file accessed, date and time of access, data volume transferred, notification of successful access and transfer, web browser and requesting domain etc.).

2.4. **Processing** means any and all activities relating to the use of personal data, from its collection through to its storage until its eventual erasure and everything in between.

2.5. **Data Subject** means the person whose personal data is being processed.

2.6. For the purposes of this Policy, **Health Information** includes the physical, mental and psychological state, passion, disease, the cause of disease communicated, perceived, tested, measured, mapped or derived data; and any data that may be related to the above mentioned.

2.7. The terms "data controller", "data controlling", "data protection incident", "supervisory authority" and "third party" shall have the meaning given to it in Article 4 of the GDPR, and shall be construed accordingly.

3. Principles. BSPL, during data processing, always pays attention to the principles, specified above:

3.1. **BSPL** processes data lawfully, fairly and with transparency – in a way that anybody would reasonably expect;

3.2. **BSPL** limits the data processing to the extent of the purpose of it – processes the data for the specific reason it collected them.

3.3. **BSPL** minimizes the processed data and does not collect more than it needs.

3.4. **BSPL** does its best to make sure that any data it holds are accurate and adequate.

3.5. **BSPL** will not store personal data for longer than it needs to.

3.6. **BSPL** always processes data securely and confidentially, and it will not share personal information without the permission of you, as the Data Subject.

4. Legal basis of processing.

4.1. As the Data Subject as a natural person uploads an image in the application by a specific, express act, the legal basis for such processing shall be a **consent** given by the Data Subject to the processing of his or her personal data for one or more specific purposes pursuant to Article 6 (1) (a) of the GDPR. Data Subject of data processing is you as a natural person who gives a consent to the data controller by uploading an image for procession in accordance with the Terms and Conditions of the providing of the Services.

4.2. For controlling and processing of health information a separate consent is done by the Data Subject in the application.

5. Scope of data processed, purpose and duration of data management.

Personal data processed	Purpose of data processing	Duration of data processing
Personal data		
E-mail address, mobile number and password	Contact, identification	Until the existence of the user account
Special category personal data		
Health information provided by the data subject (metadata)	Provide better and more detailed information for the Digital imaging in an augmented reality to the user	Until the existence of the user account

6. Storage and Security of Personal Data and recourse to data processors.

6.1. The data controller stores the electronically recorded health information will be migrated to the cloud, controlled by Amazon Web Services, Inc. (AWS)Your data will be anonymized and protected controller protects your data by processing and storing it in the system of AWS and it will be encrypted when transferring your health information on an open public network on the Internet.

6.2. **BSPL**, as data controller shall involve the following data processors in the data management process as part of the Services:

Amazon Web Services, Inc
440 Terry Ave N, Seattle, WA 98109

6.3. **BSPL** reserves the right to add further data processing entities in the data management process, which will be communicated to you as data subject by amending this Privacy Policy.

7. Data Rights.

7.1. Access to the data is restricted to natural persons who are the data controller itself or those who are employed or otherwise in legal relationship with the data controller with the aim of providing the Services, and the Special Category Data to researchers anonymously for scientific purposes. The transfer of data is allowed only if a legal obligation has to be fulfilled, in particular to public bodies in exceptional, legally binding cases.

7.2. The data subject may request, in writing, what Personal Data and health information is controlled, and inquire about the legal basis, purpose, source and duration of the data processing, or information about that the data controller given access to your personal or health data to whom, when, under what authority, regarding which data.

7.3. You as the data subject shall have the right to object to the management of data processing, to have access to data contained in the documentation, to request information about your recorded health data, to request correction or erasure of your Personal or Special Category Data.

7.4. If you want to exercise any rights described above please contact dev@businessprints.com.au

8. Miscellaneous.

8.1. You as the Data Subject may take legal action against the data controller in case of violation of your rights. Victoria, Australia has jurisdiction to hear civil litigation. At the choice of the Data Subject, the lawsuit may be instituted before the court of the address or place of residence of the data subject.

8.2. This Policy may change from time to time when necessary to reflect costumer feedback, changes in **BSPL**'s projects and the Services or legal changes. The latest effective date is highlighted at the top of this Policy. If there are material changes in this Privacy Police we will notify you posting a notice of such changes before they take effect.

8.3. For matters not regulated by this privacy statement, GDPR shall govern for EU jurisdiction and the Privacy Act 1988 for Australia.

8.4. The data controller further undertakes to act in accordance with this Policy, applicable rules and practice in the course of its data management activities and the exercise of its confidentiality obligations.