

# Privacy Policy

We commit to safeguarding the privacy of the users of the Picterus® Jaundice Pro. Therefore, the Picterus® Jaundice Pro does not collect or store any personal information about either users or patients.

## 1. Introduction

Picterus AS is the data controller for the anonymous data we collect about you in connection with the use of the Picterus® Jaundice Pro. When it comes to collecting data about patients / newborns using our system, the users of the Picterus® Jaundice Pro are seen as data controllers and the Picterus® Jaundice Pro as a data processor. In this notice, “we”, “us” and “our” refer to Picterus AS.

Both as a data controller and as a data processor, Picterus AS ensures that all data is processed in a secure and lawful manner in accordance with EU Regulation 2016/679 ("GDPR") and national data protection laws.

In this privacy statement, we explain, among other things, what data we collect and for what purposes we use it. If you have any questions, do not hesitate to contact us via the contact information listed at the end of this statement.

The privacy statement may be changed from time to time. Therefore, visit this page regularly to understand what we do. If we make extensive changes to this statement, we will always notify you before using our service.

## 2. Categories of data objects

We process anonymous data related to the following categories:

- The users of the Picterus® Jaundice Pro.
- The patient / the newborn.

## 3. Data Picterus AS collects

Picterus AS does not collect or process personal or sensitive personal information. The Picterus® Jaundice Pro app only takes images of a small part of the skin on the newborn's chest and requires no personally identifiable data.

The information we collect includes device type, operating system, the Picterus® Jaundice Pro software version, and device language. The full description of the use of the data is described in more detail below.

We may process information relating to transactions, including purchases of goods and Services, that you enter with us and/or through our website or Services (“Transaction Data”). Transaction Data may include your contact details, your payment details, and the transaction details. Transaction Data may be processed for the purpose of supplying the purchased goods and Services and keeping proper records of those transactions. The legal basis for

this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract and legal requirements for proper accounting.  
delete after reviewing:

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("Notification Data"). Notification Data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

We may process information contained in or relating to any communication that you send to us ("Correspondence Data"). Correspondence Data may include the communication content and metadata associated with the communication. Correspondence Data may be processed for the purposes of communicating with you and record-keeping, e.g., for technical support or accounting purposes. Further, when you seek technical support from us, you understand and acknowledge that the individual(s) providing you with support may need to access your Service Data and Usage Data to diagnose the problem you are seeking support for; in this case, this information will only be used to help provide you with support. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and communications with users, which we believe will benefit you

#### **4. Picterus AS and social media**

On our website, we integrated social media like and share buttons (Facebook, Twitter, LinkedIn), which allows you to share the content you like directly with your network. The social media plugins may process your personal data when you choose to share or like any content of our website with your network. Picterus AS does not control and is not responsible for the processing of personal data by these networks.

#### **5. For what purpose Picterus AS collects data**

We need the mentioned data to offer you a complete service. We may also use anonymous data for research and development purposes to improve and further develop our services. Furthermore, anonymous data can be used for customer service, marketing, communication and for legal purposes. Finally, all the images that are processed and stored on our servers are anonymized and used to help our technology become more accurate in screening for neonatal jaundice.

#### **6. The legal basis for Picterus AS processing of data**

According to the Data Protection Act, Picterus AS must base its processing of personal data on a legal basis. Our processing of personal data will be based on one or more of the following:

- The processing is necessary to fulfil an agreement to which you are a party, or to implement measures at your request before entering into an agreement.
- The processing is necessary for our legitimate interest, to the extent that this interest is not violated by your interests or fundamental rights and freedoms that require the protection of personal data.

Please note that, as mentioned above, regular use of the Picterus® Jaundice Pro does not store or collect any personal information about either users or patients. Only in the case where you contact us and, in that process, provide us with personal information will we have access to such information.

## **7. Picterus AS and the transfer of data**

Picterus AS uses third party service providers to help us offer or improve our services; this includes payment providers and financial institutions, and business partners or research institutions. The data may be transferred to, and processed by, such service providers. We will do everything necessary to ensure that third party providers that process data do so in a secure manner and in accordance with applicable law.

Service providers who process data on our behalf do so based on a data processor agreement that regulates the data processor's responsibility in connection with the processing of relevant data.

All data you provide to us and that we collect from you is stored on secure cloud servers within the territory of the EU or stored by reliable third-party service providers outside the EU, which are maintained to the same high standards. As a result, the information may be transferred and stored at a destination outside your country.

We can also share data with the authorities in cases where we are required by law to do so.

## **8. Data security**

Picterus AS has implemented various measures and procedures to safeguard the data.

All data you provide via the app when it is transferred to / or from the servers is encrypted using industry-standard encryption (TLS).

We store uploaded images in separate data warehouses. The web server infrastructure is protected by firewalls and monitoring.

We work with appropriate procedures to prevent unauthorized access to and / or misuse of data.

## **9. Storage of data**

We will store images that have been uploaded in anonymous form, for the purpose of medical, clinical, and commercial research, and for testing our services.

## **10. Personal information about children**

Our service takes images of a small part of the skin on the new-born's sternum. It is not possible to recognize the new-born based on the stored images when the app is used correctly. In the event of images containing personally identifiable information are discovered, these will be deleted from our systems.

## **11. Your rights**

You can make inquiries via email using the address below. You also have the right to contact the Data Inspectorate when you are concerned about your rights, or if you feel that we process your data illegally.

## **12. Contact information**

The Picterus® Jaundice Pro is owned and operated by Picterus AS. Our headquarters are in Professor Brochs gate 8A, 7030 Trondheim, Norway. You can contact us by email at [contact@picterus.com](mailto:contact@picterus.com), or via our website [www.picterus.com](http://www.picterus.com).

Thank you for taking the time to read our Privacy Notice. Should you have any questions or concerns, don't hesitate to contact us.