



# Privacy Policy

Version: 3.2

## 1. Introduction

At SkinVision we care about your privacy. We are fully committed to protecting your privacy and ensuring that your personal information is handled in a safe and responsible manner. This Privacy Policy explains how we collect, use, and share your personal data when you use SkinVision to start your health journey (our '**Service(s)**') or otherwise interact with us. For a more detailed understanding of our Services, please refer to our Instructions for Use. If you have any questions, do not hesitate to contact us via the contact details listed at the end of this Policy.

For further information about our use of cookies, we refer to our [Cookie Policy](#).

We might amend this Privacy Policy from time to time. Visit this page regularly in order to understand what we do. If we make changes which are relevant to your consent and underlying information, we will always notify you before you use our service.

We collect a necessary amount of data to ensure that we provide you with a safe and effective medical device. If you do not agree with our processing of personal data as described in this Privacy Policy, you cannot continue the use of our Services. If you agree with our Privacy Policy, we hereby welcome you to our service and you're ready to start making assessments.

## 2. The personal data SkinVision collects

### 2.1 Personal data you provide to us

The personal data you provide to us is collected and used ('processed') by us to provide you with our best service. To sign up with our Services, the initial personal data you are asked to provide including your first and last name, date of birth and age, and email address (together, 'minimum information') is mandatory for you to access our service. The minimum information that is required to access our services is subject to additional disclosures of personal data in different regions. For our users in the Netherlands, the additional disclosure of the citizen service number (the BSN number) or insurance number is mandatory to access our services.

In addition to the mandatory minimum information you provide in our App, we collect the information you voluntarily provide to us to complete your personal profile. That includes your profile picture, gender, location, phone number, and language. We also collect further information regarding your skin type and risk profile by taking the skin type quiz and risk profile quiz in our App.

For our Service to assess the pictures of skin lesions and give results, we need to process the pictures you take of your skin lesions, including their location on the body map and any comments. Without your explicit consent, we are not allowed to store this type of information; and in that case, we cannot provide you with our service.



We also collect your payment information. Your payment information includes your name, and optionally your phone number, credit card details (as pseudonymized), email address, IP address, country, and also, depending on payment method: IBAN and bank for payments through Ideal, credit card details for payments through Apple Pay, browser for payments through Klarna and paypal.

When you use our Smart Check services and submit a picture of your skin lesion for analysis by our service, we store the photos and collect the information of your assessment. We do this to be able to assist you with your health journey. To provide the SkinVision Services, we need to be able to securely handle your health data. This means that we process your photo with our algorithms to look for irregular patterns commonly found in cancerous skin spots. We will store the photo on our servers so you can compare photos of lesions over time and monitor them for change. Furthermore, our in-house team of experts and dermatologists need permission to check the photos for the purposes of quality control. If our team detects any signs that need to be reviewed further, it will contact you and will advise you on the next steps to take.

We will ask for your explicit consent to allow us to store this type of information before you use such service, without your consent we cannot provide you with our service. By accepting this Privacy Policy, you consent to the processing of your health data.

Additionally, if you receive a histopathology report from a board certified or accredited healthcare professional on one of the skin spots you have previously performed a skin check on, irrespective of the result you receive, you can voluntarily disclose that histopathology report with us through our App. This is a completely voluntary disclosure outside of your health journey. This means, should you share your histopathology report(s) with us, they will not be processed in a way to affect the SkinVision Service you personally receive, nor your past or future skin check results will be affected by your such disclosure. Such histopathology results will be used for the purpose of developing the SkinVision Algorithm and for Post Market Surveillance.

As part of your health journey, we may send you follow-up emails regarding the provided advice and to assist you by reminding you to seek medical attention when necessary. If you wish to reply to these emails and get in touch with our Customer Support we will collect the information that you provide in these replies from you too.

We also collect the information provided by you when you give us feedback via your Apple App Store, Google Play Store or the questionnaire.

## **2.2 Personal information you provide us regarding the health of others**

Our service is exclusively meant for your personal use. That means we cannot process others' personal data with your consent. If you want to help others, please do so by encouraging them to download their own version of SkinVision. This will help them with their health journey and ensures that any health-related messages will be delivered to the right person.



### 2.3 Automatically collected personal data

During your visit to our Website or App, we automatically collect certain information about you. This data includes hardware and software details, operating system, internet browser, data that identifies your mobile device, notification access, device-specific settings and characteristics, system activity, location details, IP address, language settings, application settings, app crashes and other device event information. We also collect your usage data about when and how you used the Service, including interaction with the elements on it and which pages you visited in the App or on the Website.

## 3. How SkinVision uses your data

We use your data to assist you in the best possible way. *Your data may be used for the following reasons:*

**Health journey:** The main reason why we collect your personal data is to supply you with our core Service: to assist you with your skin health journey and with the early detection of irregular patterns on your skin, which can be a potential sign of the development of skin cancer.

**Management and improvement of our Services:** We use the data you provide us with to manage our Website, App, and business and to improve our services continuously.

**Customer Service:** Our customer service is here to help you and we use your data to do so. We may send you email notifications and/or in-App messages relating to the results of the analysis, this includes emails in which we provide you with information and ask you to provide us with information about possible follow-up actions.

**Marketing:** In order to keep you informed, we may send you communications relating to our business, by email or other contact details you provided to us. If you submit personal information for publication on our Website, we will use that information in accordance with your explicit consent. Besides that, SkinVision uses a marketing tool in order to support SkinVision with business insights into user behaviours. Please note that your health data is never being processed for marketing purposes.

Additionally, we may use your email address to inform you about changes or updates related to your subscription, to ensure that you stay informed about important developments.

**Communications:** We will send you communication regarding assessments you make via the App. If you opt-in for our mailing list, we may send you non-commercial communications, including our newsletter. When you use our services, we may send you a questionnaire or invite you to provide a review of your experiences with our service. We also may get in touch with you regarding feedback, inquiries, and complaints you made regarding our Website and App.

**Research activities:** In order to support the research on skin cancer and detection methods, we may use your data, pseudonymized (without a direct link to your identity) or anonymized (without us being able to identify you at all), for research purposes. This may include sharing your data with carefully selected third party research institutions. By uploading your images in the App, you explicitly consent to the images being processed for the purposes of the provision of the services and to be used anonymously for the purposes of research and testing of our services. As such, your images may be reviewed by our employees or third-party consultants who work for us and who are bound by strict



confidentiality. For more detailed information on the scientific research consent, please see Section 10 of this Privacy Policy

**Legal purposes:** In certain cases, we may need to use your information to handle and resolve legal disputes, for regulatory investigations and compliance, or to enforce the terms of use of the service as reasonably expected.

*We collect and process your data based on the following legal grounds:*

**Contractual necessity:** In order to fulfil the contract you enter into with us when you use our Services, we have to process some essential information. We need to process a necessary level of your personal information, that is your email address, your pictures of skin lesions, risk assessment, and payment information, when you wish to use one of our paid services.

**Legitimate interests:** We are committed to improving and growing our service. Some of your data can help us to improve and promote our Service and Website, other data we may need for administrative, legal purposes or anti-fraud activities.

**Legal obligations:** We have to comply with certain laws and (country specific) regulations. In order to comply with these, we need information about your location and date of birth.

**Consent:** For certain promotional and marketing activities, we may ask additional consent. When you wish to withdraw your consent, please contact us via the contact details at the bottom of this Policy.

**Explicit consent:** Data regarding the health of your skin and risk assessments is a more sensitive category of data. In order to lawfully process this data for you, we will ask your explicit consent before we can assist you. When you wish to withdraw your consent, please contact us via the contact details at the bottom of this Policy. When you withdraw your consent, we will not be able to provide you with our Services and you should discontinue using our Services.

#### **4. SkinVision through your health insurance company**

When you access SkinVision Services through your health insurance company, we may process additional data. For example, we may ask you to fill in your personal identity number if we are required by local law to process this information before we can provide you the service.

Depending on your insurance company, you may be requested to fill in your insurance number in order to have access to the SkinVision Service as part of your insurance scheme. You sharing the insurance number will mean that you are giving consent. We will share the insurance number with your insurance company, as part of the billing process. This consent can be revoked at any time. In the event of revocation, you will no longer be able to use the app.

#### **5. SkinVision and third parties**

For some specific reasons, SkinVision may share your personal data with carefully-selected third parties. These parties are Processors for your personal and health data. Please find an up-to-date list of the categories of our third parties here:



- Receiving feedback on how users appreciate our service is of vital importance. We use Satismeter to ask users to provide the Net Promotor Score (NPS) and leave their remarks. We therefore share the email address of our users.
- We use Branch.io in our service to allow deep linking into our applications. This way we can provide a seamless user experience.
- Crashlytics is used for recording crash data and providing this back to our development team so that we can continue making our service better continuously.
- Our app uses Firebase for analytic and marketing purposes and to send you push messages.
- We use Braze as marketing automation and customer support tools.
- Sendgrid handles sending any service mails that we need to deliver as part of the SkinVision Service. We therefore share the email address of our users.
- Twilio handles sending any SMS text messages that we need to deliver as part of the SkinVision Service.
- We use Zendesk as our main customer support tool for handling emails.
- We may use Zivver for ensuring secure communication via our customer support.
- We use Adyen to process your payment information. Adyen may collect personal details such as your email, address and/or phone number to be able to process your payment. No health data is collected by Adyen.
- We use AWS to store our database within their systems.
- OpenWeatherMap API uses your location so we can provide you a personalized UV index
- Vecozo matches data of users with their data within the databases of health insurers to check for completeness of declarations and matching details. Insurance policy check for insured dutch users.
- For scientific research purposes, we share data with Erasmus MC and TTP Zorg.
- We provide aggregated and anonymised data to your insurance company. If required by law or the contract you and/or SkinVision has with your insurance company, we might also share: name, date of birth, insurance number, citizen number.
- We use Stitch for extracting and loading data from one source to another. This supplier allows us to connect and analyse data that is necessary for our business performance and is used on a daily basis.
- We occasionally use Survio for sending out surveys to some of our users to receive feedback on our service. We therefore share the email address of our users.
- For scientific research purposes, we share aggregated and fully anonymized data with IQVIA for users in Spain.

In the settings section of your app, you can disable your consent toggle for "tracking and analytics consent", that includes the collection of tracking and analytics data by Branch.io, Crashlytics, Firebase and Braze.

### **Authorised representatives/Sponsors**

Depending on the local regulatory requirements, SkinVision may appoint a local authorised representative or sponsor. In case of post-market vigilance procedures in accordance with medical device legislation, SkinVision might have to share personal and health data with the local authorised representative or sponsor. In any case, SkinVision will inform the User if this is necessary.



The details of the local authorised representatives/sponsors are:

- In the UK, SkinVision has appointed International Associates Limited as its authorised representative. Here are the contact details:  
International Associates Limited  
Centrum House, 38 Queen Street, Glasgow,  
Lanarkshire, G1 3DX, UK  
[UKRP@ia-uk.com](mailto:UKRP@ia-uk.com)
- In Australia, SkinVision has appointed Emergo as its sponsor. Here are the contact details:  
201 Sussex Street,  
Level 20, Tower II Darling Park,  
Sydney, NSW 2000, Australia
- In New Zealand, SkinVision has appointed Carsl Consulting as its sponsor. Here are the contact details:  
11 Mill Road, RD 2, Pukekohe,  
Auckland, New Zealand
- In Argentina, SkinVision has appointed PHARMASSIST SRL as its authorised representative. Here are the contact details:  
Caracas 1649,  
CABA, Argentina

## **6. SkinVision and social media**

SkinVision uses social media for various reasons.

On our Website, we integrated social media like and share buttons (Facebook, Twitter, LinkedIn, Reddit), 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. SkinVision does not control and is not responsible for the processing of personal data by these networks.

## **7. Data privacy, data security, and data retention**

### **7.1 Privacy**

All data you provide to us and we collect from you is stored on secure cloud servers (the Servers) in the territory of the European Union, or stored by trusted third party service providers outside of the EU, which are held to similarly high standards. As a result, your personal information may be transferred to and stored at a destination outside your country. By submitting your personal information, you agree to the transfer of your personal information to the servers.

Personal information may also be processed by staff or by other third party service providers operating outside your country who work for us. We take such steps as are necessary for the circumstances to



ensure that any third party service providers treat your data securely and in accordance with applicable laws.

## **7.2 Data security**

All data that you provide through the App and/or the Website is encrypted when it is transferred to or from the servers using industry-standard encryption (TLS). Furthermore, data is stored in encrypted form when at rest on the servers.

We store your account information and your digital images in separate data stores. The cloud server infrastructure is protected using firewalls and monitoring.

We work with appropriate procedures to prevent unauthorised access to and/or misuse of your personal data.

SkinVision uses appropriate procedures and business systems to safeguard your personal data. Furthermore, we use security procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorized personnel can access your personal data.

SkinVision processes and stores data in Ireland, with backups in France.

## **7.3 Data retention**

SkinVision will destroy, de-identify or anonymize your personal information once it is no longer required for the purpose or purposes for which it was collected.

If you terminate the Services and delete your account, we will retain your personal information for a period of 12 months or as long as required by legal provisions that we have to comply with, after which we will delete your data.

We will retain the images you have uploaded prior to termination in anonymous form only, for the purposes of medical, clinical and commercial research, and for testing of the Services. We will ask for your consent to process your data anonymously for research purposes.

We will retain (electronic) documents containing personal information:

- to the extent that we are required to do so by law;
- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

If you delete a histopathology report you have provided us on the app, we will immediately anonymise the data, meaning that it will not carry any personal identifiers that can link it to your profile, and retain the data in anonymised form for the purposes of medical, clinical and commercial research, and for testing of the Services.



## **8. Personal data of children**

Our service can only be used when you have reached the age of eighteen (18) years or when you are older. When we identify personal information of children younger than eighteen (18) years old, we shall delete the data based on our legal obligations.

## **9. Your rights – access to your information**

Upon your request, we will provide you with access to your personal information that is stored by us. We will provide the data to you in a structured, understandable and machine readable way. To ensure the security of your personal data, we request that you provide us with appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport plus an original copy of a utility bill showing your current address). We will require you to make your personal identification number and picture invisible to us.

In your request for access, we also request that you identify, as clearly as possible, the type(s) of information you wish to have access to. We will comply with your request to provide access to your personal information within 30 days and if you agree, we may charge you our reasonable costs incurred in supplying you with access to this information.

At any time you can make a request to review, correct, delete, or obtain your data. You can also withdraw consent for the processing of the personal data we hold of you. You can make such request by mail or email, using the addresses listed below. You also have the right to contact the Data Protection Authority when you have concerns about your rights, or if you feel that we are unlawfully processing your data.

You may oppose the processing of personal information concerning you, even if they are relevant to the purpose of the collection.

You may instruct us at any time not to process your personal information for marketing purposes and we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes. Your health data is never used for marketing purposes.

## **10. Scientific research consent**

Handling your data safely and securely is a priority for SkinVision. We want to make sure you are fully aware of how we collect and process personal data to support our research purposes. We may use your data for scientific research to help improve our app, algorithm, and services. This can occur under three distinct conditions.

First, we may use your personal information for internal research purposes. All the photos that are processed and stored on our servers are anonymized and used to help our technology become more accurate in detecting skin cancer, ultimately saving lives. This information helps to further improve our service and it assists more people in detecting suspicious moles and other skin spots with increased accuracy.

Second, we collaborate with third parties including Erasmus MC Rotterdam by sharing aggregated and anonymised data that cannot be traced back to any individual. This data is used to evaluate and improve



the effectiveness and accuracy of the SkinVision Service, including the impact of the use of SkinVision on the secondary and tertiary health consumption. Since this information is fully anonymised, it no longer qualifies as personal data under the GDPR.

Third, you may obtain access to our app for the purposes of a scientific research study or a clinical study. If you are participating in a specific clinical research study, you will be asked to sign an explicit consent form related to that study. Participation also requires agreement to the SkinVision Privacy Policy. Your personal data will be processed only as outlined in the study protocol and your consent documentation. In such case, The images shall be stored exclusively within SkinVision servers, unless agreed otherwise with you, the user of the app.

All research is conducted in accordance with applicable data protection laws, including GDPR and ISO 27001 standards.

Research institutions may only use our Services for research purposes following SkinVision's written consent over the study protocol. Any data collected through the SkinVision Service may only be used following our explicit written consent.

## **11. Responsible party for the processing of your data**

The Websites and the Application are owned and operated by Skin Vision B.V., our principal place of business is at Kraanspoor 28, 1033 SE Amsterdam, The Netherlands.

You can contact us by writing to the business address given above, by using our Website contact form or the feedback form in the App, or by sending an email to the Data Privacy Officer at [regulatory@skinvision.com](mailto:regulatory@skinvision.com).