

# PRECURE's Data Ethics

## 1. Your data is safe.

Securing your data is very important to us. We are very aware of the possible implications related to collecting data and potential misuse. Of course, we are compliant with GDPR, HIPAA, and other legislation to keep your data safe. We would like to highlight three ways; we are doing this:

- A. All data received and stored are anonymous and not linked to an identifiable person. No one will be able to see whose data is who's in our database. This also means that employees working with the data do not know the origin of the data.
- B. We have secured the data. Data is stored in Microsoft Azure, with their level of security for this type of data. We don't have data stored locally and all access is password protected and limited to the few employees working with the data. So, no one from outside the organization will get access to your data.
- C. We don't sell your data or give your data to third party. You may at any point of time ask for your data to be deleted. We don't hand your data over to e.g. your employer. When we conduct a PRECURE Insight analysis, you will have to sign that your employer can get access to your data in report form. By default, our reporting is anonymous and analyzed groups have to be larger than 5.

**DATE**  
October 1<sup>st</sup>, 2020

## 2. We support research.

Anonymized data might be made available for research institutions for research purposes only. The way we collect data is new. There is a lot of knowledge in the vast amount of data, which we would like to help research with for everyone's benefit. Risk factors that have not been identified, other parameters or patterns that can be extracted from the data. This will help the researches to be able to better determine, predict and prognose risk related muscle activity. Thus, making prevention and treatment better. It will also help us improve the users' value from using our products.

## 3. Data ethics

We believe that transparency is the key value to build healthy relation with our customers. At PRECURE, we are all about good occupational health and physical wellbeing of your employees. Here we describe the privacy practices for our services/products and website. In the following section, PRECURE ApS determines the purposes and means of the storing and processing of your personal data.

### **PRECURE ApS**

Bryggeristræde 2  
DK-3770 Allinge  
Denmark

[www.precure.dk](http://www.precure.dk)  
[mail@precure.dk](mailto:mail@precure.dk)  
+45 5355 8217

CVR 38174010  
Danske Bank  
Reg.nr. 3409  
Kontonr. 12159862

#### 4. Contact Details

PRECURE  
Klausdalsbrovej 601  
2750 Ballerup  
Denmark  
VAT no./CVR 38174010  
[mail@precure.dk](mailto:mail@precure.dk)

PRECURE ApS does not employ a Data Protection Officer. If you have any questions or concerns regarding privacy or personal data you have given us, kindly contact PRECURE at any time. For details on how to contact us, please see "Contact Information" or send an email directly to our email: [mail@precure.dk](mailto:mail@precure.dk)

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#### 5. Type of data we store from our website

Various technologies may be used on our website/devices/app to improve user experience. Such technologies may lead to personal data being collected automatically by us or by third parties on our behalf. Examples of such technologies include cookies analytics etc. Our site may, from time to time, contain links to and from the websites. Please note that these websites have their own privacy policies for which we do not accept any liability. Please check these policies before you submit any information to their websites.

#### 6. Data through devices/app

To improve users' behaviors to correct their muscular movement, we collect information about your employees such weight, gender, activity level, and job function etc.

##### A. Consent

###### How do you get my consent?

By purchasing/subscribing to our products/services you give us your consent to store and process your data.

###### How do I withdraw my consent?

You/your company can withdraw your consent any time by contacting us through email [mail@precure.dk](mailto:mail@precure.dk)

##### B. What so we do with your information?

All data received and stored are anonymous and not linked to an identifiable person. This also means that the employees working with the data do not know the origin of the data. In case of data breach, we must inform you/company. We must do this within 72 hours of becoming aware of the data breach.

##### C. We collect:

- Physiological data, more precisely the movements of the forearm and the muscle activity of the forearm.
- General individual attributes like age, gender, injuries, height...

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- Specific information about the work activity of interest.

We do not sell your data or give it to third parties. You may at any point of time ask for your data to be deleted. In order to delete your data, you just need to provide the device number that was provided to you by means of your employer, therefore, your employer will communicate us the device number from which the data has to be deleted. In this way, the employer does not know which data belongs to you and we do not know who you are, so your identity remains anonymous. The report produced by a PRECURE Insight analysis is anonymous by default, this means that your data will appear in the report but will never be linked to a name or identification number. To avoid deducing the identity of a person by narrowing down the data shown in the report, the group of people analyzed must be greater than 5 individuals.

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#### D. Disclosure

We may disclose your personal information if we are required by law to do so or if you violate our Terms of Service.

#### E. Where we store your data

Your data is stored on Microsoft Azure. Microsoft Azure comply with EU GDPR. You can read about Microsoft Azure data protection policy here in detail <https://docs.microsoft.com/en-us/azure/security/fundamentals/protection-customer-data>

### 7. Security

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered, or destroyed.

### 8. Changes to this data ethic policy

We reserve the right to modify this privacy policy at any time, so please review it frequently.

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## 9. References

<https://gdpr.eu/checklist/>

According to Chapter 2 Article 6 our data is legally processed  
<https://gdpr.eu/article-6-how-to-process-personal-data-legally/?cn-reloaded=1>

We are not covered by Chapter 2, Art 7-11 displays processing of special data  
<https://gdpr.eu/tag/chapter-2/>

We provide “Transparent information, communication and modalities for the exercise of the rights of the data subject”  
<https://gdpr.eu/article-12-how-controllers-should-provide-personal-data-to-the-subject/>

We perform “Data protection by design and by default”  
<https://gdpr.eu/article-25-data-protection-by-design/>

End-to-end incryption  
<https://gdpr.eu/article-32-security-of-processing/>

Appropriate technical and organisational measures – operational security  
<https://gdpr.eu/recital-78-appropriate-technical-and-organisational-measures/>

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