PRIVACY STATEMENT

This statement relates to our privacy practices in connection with this mobile application called 'Beats Medical' (the '**App**').

NB: This App uses the features of your mobile device to collect data about you as part of the service we provide.

This document is to inform you about how we treat your personal information and to explain in particular how your personal information is processed when you use our App. As a result, you will be able to provide consent to the processing of your personal information in a free and informed way in the sections of the App in which you are asked to provide personal information. We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identifiable as such.

This App is operated by Beats Medical Limited, a company incorporated and registered in Ireland with company registration number 518631 with its registered office at Beats Medical IDCC Suite 1196, 77 Sir John Rogerson's Quay, Dublin 2, Ireland ("**Beats Medical**", "we", "us" or "our"). You can contact us at this address or by using any of the contact information provided at the end of this statement.

General Statement

We fully respect your right to privacy, and will not collect personal information about you on this App without your permission. Any personal information which you volunteer to us will be treated with high standards of security and confidentiality, in accordance with the Data Protection Acts 1988 and 2003 ('DPA').

Important Notice

The terms governing the general use of our App are set out in our [User Agreement]. By using this App and registering as a member you are deemed to fully accept this Privacy Statement and our User Agreement.

Information we may collect from you

We may collect and process the following data about you:

- 1. General Information Volunteered to Us: Information that you provide by filling in forms on our App. This includes information provided at the time of registering to use our App, subscribing to our services or subscribing to our newsletter, push notifications or updates. We may also ask you for information when you report a problem with our App.
- 2. Registration Information: In order to allow you to register as a user of our App it is necessary for us to ask you for certain information that allows us to provide you with our service. This information includes your name, username (which you create), your medical condition (Parkinson's diagnosis), a valid email address, residential address and date of birth. We use your username and password to authenticate your login details and permit access to your account.
- 3. **Medication Calendar Service:** For the purpose of using the calendar service on our App, you may provide us with details of your medications, dosage and timing of dosages.
- 4. Information Collected from your Mobile: Core to the service we provide via our App is the collection of certain data from your use of your mobile device. This data is collected from the [accelerometer] built into your mobile device. We can record your use of your mobile device for the purpose of our service including your cadence

(steps/minute) and total number of steps taken in your 2 minute assessment and treatment sessions daily; duration of treatments; metronome prescription; x,y coordinate graphs of your steps taken during assessments and treatments. If you use our calendar service, we will record your answers to our reminders to take your medication. We record your medication compliance (whether you have clicked 'yes' or 'no' to the question "*Have you taken your medication?*" which will appear for each reminder set) and the names you have assigned to each medication reminder that you have inputted in the App.

By using the App or any of our services, you consent to us collecting and using technical information about your device(s) and related software, hardware and peripherals for the services that are internet-based or wireless and improve our products and to provide any services to you.

NB. Other than the above information, we do not ask for, and we request you refrain from providing us with, any details or information of a medical or clinical nature concerning you or anyone else.

- 5. If you contact us, we may keep a record of that correspondence.
- 6. [In order to provide our service details of your visits to the App including, but not limited to, traffic data, weblogs and other communication data and the resources that you access may be recorded / processed.]

Uses made of the information

- 1. If you register your details with us, we may use the details you have given us, together with details of how you use our App as follows:
 - a) to provide our service;
 - b) to respond to your queries and requests;
 - c) to manage and improve our services and the App;
 - d) to notify you of changes to our services, the App, our Privacy Statement and/or any of our other published notices and terms and conditions;
 - e) [to produce statistical studies destined for third parties to facilitate better knowledge of the patient concerns and experiences, or contributing to the improvement of disease knowledge, pharmacovigilance and prevention, or development or improvement of healthcare technologies or therapies. Such statistical studies and results will always be transmitted in aggregate and anonymous so no individual is personally identifiable;]
 - f) [to contact you regarding healthcare research and development projects we believe may interest you;]
 - g) if you have consented, to provide you with newsletters as set out in this Privacy Statement;
 - h) if applicable, to facilitate your participation in surveys you may wish to partake; and
 - i) to understand statistical data about user browsing actions and patterns, which does not personally identify you.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing and/or processing. We will take steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement.

How long do we retain the information you provide us

We retain the personal information you give us for no longer than is necessary for the purposes for which the information was obtained. The information you provide us on registration will be kept for as long as you are a registered member of our service, unless you amend or delete the information. If you cancel your registration we retain your data for one year, unless you ask us to erase it.

Disclosure of your information

Any information which you provide us in this way is not made available to any third parties unless you give your prior consent, and is used by us only in line with the purposes set out in this Privacy Statement. However, we may consider it necessary to disclose personal information without your consent or without consulting you, when we believe that it is appropriate to comply with our legal obligations and/or a Court Order, to cooperate with any law enforcement agencies, to enforce this Privacy Statement, the <u>User Agreement</u> or other legal rights, to protect the security of the App, to prevent fraud, or otherwise to protect our legitimate interests and/or the legitimate interests of other users.

Newsletters and Updates

If you subscribe to our newsletter, push notifications or any other e-mail updates, by submitting your e-mail address through a subscribe facility on the App, and you wish to optout of receiving these communications, please access the "Unsubscribe" link that is available on all such emails. If you have any difficulty unsubscribing please contact us using the contact information provided at the end of this Privacy Statement.

Updating your personal information

If you want to modify or update your registered details at any time, you may inform us of any changes in your personal information, and we will update or modify your personal information accordingly.

Requests regarding data supplied via this website

On request, we supply copies of your personal data which you may have supplied via this App. If you wish to obtain such copies, you must write to us at our mailing address provided below, or e-mail us at <u>info@beatsmedical.com</u>. You should include any personal identifiers which you supplied earlier via the App (e.g. username, e-mail address and date of birth). We will also require your full name and residential address in the circumstances.

If you discover that we hold inaccurate information about you, you can modify or update your user profile through the <u>info@beatsmedical.com</u> or request us to correct that information. Such a request must be in writing and sent to our [Mailing Address / email address] set out below.

In certain circumstances you may also request that data which you have supplied via the App be deleted.

Contacting Us

If you have any questions, requests or complaints regarding this Privacy Statement, including the activities of any other users of the App, please contact us using the following information:

Web:	http://www.beatsmedical.com
Email:	info@beatsmedical.com
Mailing Address:	IDCC Suite 1196, 77 Sir John Rogerson's Quay, Dublin 2, Ireland

Changes to this Statement

We do update our Privacy Statement from time to time, as our data collection practices change. By using our App you agree to be bound by this Privacy Statement and any revisions in effect at the time of use. We encourage you to periodically review our Privacy Statement to determine the current policies in force.

This statement was last modified April 2014