



Privacy Policy

We at EUDoctor, operated by Brave Bear d.o.o., are committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the personal data we collect from users of our mobile application.

By using the Services, users consent to the collection and use of their Personal Data by us. You also represent to us that you have any and all authorizations necessary to use these Services including using them to process Personal Data. We collect and use the information you provide to us, including information obtained from your use of the Services. Also, we may use the information that we collect for our internal purposes to develop, tune, enhance, and improve our Services, and for advertising and marketing consistent with this Privacy Policy.

This privacy policy has been compiled to better serve those who are concerned with how their 'Personal Data' is being used online. Personal Information means data which relate to a living individual who can be identified – (a) from those data, or (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

Please read our privacy policy carefully to get a clear understanding of how our website collects, uses, protects or otherwise handles users' Personal Data.

This Privacy Policy is intended to inform users about how our application treats Personal Data that it processes about users. If users do not agree to any part of this Privacy Policy, then we cannot provide our Services to users and users should stop accessing our services.

By using the Services, You acknowledge, consent and agree that we may collect, process, and use the information that you provide to us and that such information shall only be used by us or third parties acting under our direction, pursuant to confidentiality agreements, to develop, tune, enhance, and improve the Services. Although we may attempt to notify you when changes are made to this Privacy Policy, you are responsible for periodically reviewing any changes which may be made to the Policy. We may, in our sole discretion, modify or revise the Policy at any time, and you agree to be bound by the same.

Our privacy policy is subject to change at any time without notice. To make sure you are aware of any changes, please review this policy periodically.



Collecting and Using Your Personal Data

Information we collect

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- email address
- null name
- phone number
- birthday
- usage data

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Information from Third-Party Social Media Services

The Company allows You to create an account and log in to use the Service through the following Third-party Social Media Services:

- Google
- Facebook
- Apple

If You decide to register through or otherwise grant us access to a Third-Party Social Media Service, We may collect personal data that is already associated with



Your Third-Party Social Media Service's account, such as Your full name, Your email address, Your phone number, Your gender associated with that account.

You may also have the option of sharing additional information with the Company through Your Third-Party Social Media Service's account. If You choose to provide such information and Personal Data, during registration or otherwise, You are giving the Company permission to use and store it in a manner consistent with this Privacy Policy.

Information Collected while Using the Application

While using Our Application, in order to provide features of Our Application, We may collect, with Your prior permission:

- Device's camera - video recording during video calls with Our doctors
 - We use this information to provide features of Our Service, to improve and customize Our Service. The information is not uploaded to the Company's servers and/or a Service Provider's server, it is used only during video calls- You can enable or disable access to this information at any time, through Your Device settings.
 - permission name android: android.permission.CAMERA
 - permission name iOS: NSCameraUsageDescription
- Device's microphone - sound recording during video calls with Our doctors
 - We use this information to provide features of Our Service, to improve and customize Our Service. The information is not uploaded to the Company's servers and/or a Service Provider's server, it is used only during video calls
 - You can enable or disable access to this information at any time, through Your Device settings.
 - permission name android: android.permission.RECORD_AUDIO, android.permission.MODIFY_AUDIO_SETTINGS
 - permission name iOS: NSMicrophoneUsageDescription
- Device's fingerprint/biometric - user biometric or fingerprint is used to confirm identity in the application
 - We use this information to provide features of Our Service, to improve and customize Our Service. The information is not uploaded to the Company's servers and/or a Service Provider's server, it is stored only in Your device in secure storage.
 - You can enable or disable access to this information at any time, through Your Device settings.



- permission name android: USE_BIOMETRIC, USE_FINGERPRINT
- permission name iOS: NSFaceIDUsageDescription,
- Device's storage - used for saving biometric/fingerprint to users device
 - We use this information to provide features of Our Service, to improve and customize Our Service. The information is not uploaded to the Company's servers and/or a Service Provider's server, it is stored only in Your device in secure storage.
 - You can enable or disable access to this information at any time, through Your Device settings.
 - permission name android: WRITE_EXTERNAL_STORAGE
- Device's calendar - device's calendar is used to save users appointments for video consultations
 - We use this information to provide features of Our Service, to improve and customise Our Service. The information is not uploaded to the Company's servers and/or a Service Provider's server, it is stored only in Your device in secure storage.
 - You can enable or disable access to this information at any time, through Your Device settings.
 - permission name android: WRITE_CALENDAR
 - permission name iOS: NSCalendarsUsageDescription

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- To provide and maintain our Service, including to monitor the usage of our Service.
- To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.



- To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.
- For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- With business partners: We may share Your information with Our business partners to offer You certain products, services or promotions.
- With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.
- With Your consent: We may disclose Your personal information for any other purpose with Your consent.



Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information

Disclosure of Your Personal Data

- **Business Transfers**

As our businesses continue to evolve, we might sell one or more of our companies, subsidiaries or business units. In such transactions, personally identifiable information generally is one of the transferred business assets. In



such event, this Privacy Policy may be amended as set forth below or the collection and uses of your personally identifiable information may be governed by a different privacy policy.

- **Protection of Our Services and Others**

We reserve the right to release personally identifiable information to unaffiliated third parties when we believe its release is appropriate to comply with the law, enforce or apply our Terms and Conditions and other agreements, or protect the rights, property or safety of Trader Interactive, our users or others. This includes exchanging information with other unaffiliated third parties in connection with fraud protection and credit risk reduction.

- **With Your Consent**

Other than as set out above, you will receive notice and have the opportunity to withhold consent when personally identifiable information

Security of Your Personal Data

- We are very concerned about safeguarding the confidentiality of your personally identifiable information. We employ administrative, physical and electronic measures designed to protect your information from unauthorized access.
- By using this Application or the Services or providing Personal Information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of this Application or Services.
- We use commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your Personal Information. Your sensitive information, such as payment information, is encrypted when it is transmitted to us. We cannot, however, ensure or warrant the security of any information you transmit to us and you do so at your own risk. Using unsecured wi-fi or other unprotected networks to submit messages through the Service is never recommended. Once we receive your transmission of information, we make commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps.
- Notwithstanding anything to the contrary in this Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our rights or property. However, nothing in this Policy is intended to limit any legal defenses or

objections that you may have to a third party, including a government's, request to disclose your information.

- However, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. Please do not send us credit card information and/or other sensitive information through email. If you have reason to believe that your interaction with us is not secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us on our email eudoctor@eudoctor.org.

RIGHTS OF THE DATA SUBJECT

Right of confirmation

Each data subject shall have the right granted by the European legislators to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

Right of access

Each data subject shall have the right granted by the European legislators to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;

- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.
- Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer. If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to the point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.
- If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by us, he or she may, at any time, contact any employee of the controller. Any of our Employees shall promptly ensure that the erasure request is complied with immediately.
- Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. Any of our employees will arrange the necessary measures in individual cases.

Right of restriction of processing

- Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:
- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data. The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead of the restriction of their use instead. The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims. The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject. If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by us, he or she may at any time contact any

employee of the controller. Our Employees will arrange the restriction of the processing.

Right to data portability

- Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.
- In order to assert the right to data portability, the data subject may at any time contact any of our employee.

Right to object

- Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions. We shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise or defence of legal claims. If we process personal data for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects us to the processing for direct marketing purposes, we will no longer process the

personal data for these purposes. In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by us for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

- In order to exercise the right to object, the data subject may contact any employee of our Company. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

Automated individual decision-making, including profiling

- Each data subject shall have the right granted by the European legislators not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent. If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, we shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.
- If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any our employee.

Right to withdraw data protection consent

- Each data subject shall have the right granted by the European legislator to withdraw his or her consent to the processing of his or her personal data at any time.
- If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any of our employees.



Right to request access

You also have a right to access information we hold about you. We are happy to provide you with details of your Personal Information that we hold or process. To protect your personal information, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us on the above details.

Right to withdraw consent

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us on the above details

Children's Privacy

Our services are available only to persons who can form a legally binding contract with us as per the applicable laws. Protecting the privacy of young children is especially important. Thus, we do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to register. If you are under 18, please do not attempt to register for the Service or send any information about yourself to us, including your name, address, telephone number, or email address. No one under the age of 18 may provide any personal information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services

Changes to Our Privacy Policy

We may update this Privacy Policy and information security procedures from time to time. If these privacy and/or information security procedures materially change at any time in the future, we will post the new changes conspicuously on the Website to notify you and provide you with the ability to opt out in accordance



with the provisions set forth above. Continued use of our Website and Service, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: eudoctor@eudoctor.org