

Privacy Policy

Data processing information and consent acquisition for the Glucoscaner website

Dynamic Brain Lab LLC (DBL), provides the following information about the processing of personal data that you, as an interested party, provides us.

Specifically:

- a. for the registration to the website (account creation) the required data are the following: email address, phone number and password;
- b. for the purchase of the Glucoscaner products the required data are the following: name and surname, shipping address, in addition to the data referred to under point a).

The personal data you provide will be processed.

Purpose and legal basis of the processing:

- a. ***Purpose of identity verification, processing registration as a user on the website;***
- b. ***Purpose relating to contractual execution.*** Your personal data will be processed for the purpose of fulfilling the obligations arising from the contract relating to the purchase of the product and in any case for the execution of obligations arising from all contractual relationships, in order to allow *DBL* to provide the best service, in particular for:
 - i. the conclusion, management and execution of the contractual relations between you and *DBL*;
 - ii. respond to your enquiries and provide product support;
 - iii. the communication of product warnings.
- c. ***Purpose of the law.*** Your personal data will also be processed for:
 - i. execute legal obligations deriving from national, EU and international laws and regulations;
 - ii. ascertain, exercise and/or defend in litigation, including judicial proceedings, a right of *DBL*;
 - iii. comply with tax and accounting obligations.
- d. ***Further purposes.*** In addition, your personal data will be processed for:
 1. **Marketing purposes**, which include promotional activities of the *DBL* carried out both with automated methods (e.g. email, SMS, applications for instant messaging, etc.) and with non-automated methods (e.g. postal mail, telephone with operator, etc.). In particular, *DBL* may use your email address, provided at the time of registration on the website, to send you information and promotional communications related to services and similar products offered by *DBL*.
 2. **Business purposes and statistics.** Your personal data will also be processed for purposes related to or relevant to the activities of *DBL* and for the anonymous processing of statistics and market research.

Nature of data provision and consequences of refusal.

The provision of your personal data is not compulsory, however, in the absence of the data requested exclusively for the purposes indicated in points a) and b) (purposes relating to contractual and legal service) the service requested or part of it cannot be performed and you cannot take advantage of the opportunities mentioned above.

Categories of recipients of personal data.

Your data will not be disclosed. Your data may be communicated, exclusively for the purposes mentioned above, to the following categories of subjects:

- the internal staff of *DBL*, as authorized person and/or data protection officer;
- companies belonging to the same group of *DBL*;
- service providers related to the product sale (e.g. logistics partners to provide delivery services, cloud service providers);
- persons, companies, who provide services or activities of assistance and advice to *DBL* in order to protect their rights;
- subjects whose right to access your data is recognized by law.

Methods of treatment

The processing of data is carried out electronically, through recording, processing, storage and transmission of data, including with the help of computer tools.

The tools and supports used to carry out the processing activities are suitable to guarantee the security and confidentiality of the data.

In carrying out its processing activities, *DBL* undertakes to:

- ensure the accuracy and updating of the data processed and promptly receive any corrections and/or additions required by the interested party;
- take appropriate security measures to ensure adequate data protection, considering the potential impacts of the processing on the fundamental rights and freedoms of the data subject;
- notify the interested party, within the times and in the cases provided for by the mandatory laws, of any violations of personal data;
- ensure that the processing operations comply with the applicable legal provisions.

Retention of personal data.

Personal data will be kept for a period not exceeding that necessary for the achievement of the purposes for which they were collected and subsequently processed. Personal data will be kept for the duration of the contract you have concluded and also for a later period:

- i. within the time limits laid down by the legislation in force;
- ii. within the period necessary to protect the rights of the data controller in the event of any dispute relating to the provision of the service.

Contact details

The *data controller* is Dynamic Brain Lab LLC, which can be contacted at the following addresses:

- Postal address: 3-33-13 Kamimeguro, Meguro-ku, 153-0051, Tokyo Japan;
- e-mail address: privacy@dynamicbrainlab.com

Rights of the person concerned.

At any time, you have the right, including in relation to profiling, to:

- ask the data controller for access to your personal data and information relating to the same; the amendment of inaccurate data or the integration of incomplete data; the cancellation of personal data concerning you; the limitation of the processing of your personal data;
- Request and obtain from the data controller - in the event that the legal basis of the processing is the contract or consent, and the same is carried out by automated means - your personal data in a structured format and readable by automatic device, also in order to communicate such data to another holder of the treatment (so-called right to portability of personal data);
- Oppose at any time to the processing of your personal data to the occurrence of special situations that affect you;
- Revoke your consent at any time, limited to cases where the processing is based on your consent for one or more specific purposes and concerns common personal data (e.g. date and place of birth or place of residence), or particular categories of data (e.g. data revealing your racial origin, political opinions, religious beliefs, health or sex life). Processing based on consent and carried out prior to the revocation of the same, however, retains its legality;
- Complaint to a supervisory authority.

Provision of consent to treatment.

Having read the information, I express my consent to the processing of my personal data for the purposes indicated:

A) in points a), b) and c) (purpose related to contractual and statutory execution) *.

B) in point c) (marketing purposes).

C) in point c) (business purposes and statistics),

* Consent is required to proceed with the registration on the website and the purchase of the product.

Data processing information and consent acquisition for the Glucoscanner App.

Dynamic Brain Lab LLC, provides the following information about the processing of personal data that you, as an interested party, can provide us with when using the App.

Specifically:

- a. for registration/access to the App (account creation), the data used will be related to the Glucoscanner account (account identifier, nickname and password);
- b. For monitoring the health of the customer using the Glucoscanner product, the data requested and processed will be blood glucose levels, oxygen, heartbeats, body temperature;
- c. position data (GPS data) of the user during measurement with the Glucoscanner device;

- d. For device and network information identification, the data will be device identifier and type, personal and device settings, device location data, IP address and network type.

Purpose and legal basis of the processing.

- a. **Purpose of identity verification, processing registration as a user on the App (creation of an account);**
- b. **Purpose of health monitoring.** Your personal data will be processed for the purpose of performing the service offered through the App, i.e. monitoring data such as blood glucose levels, oxygen, heartbeats. In particular, monitoring of such data could be used to identify, and possibly prevent, user health problems related to specific conditions. Height and weight are monitored for more accurate calculation of the above data. The data will be stored in the cloud and can be viewed at any time on the device.
- c. **Security purposes.** We will use your position data (GPS data) during the measurement with the Glucoscanner device for security purposes and possibly for intervention or rescue: if the person needs help, the data sent by the mobile, with the measurement made by our device, will report information about the last known position of the user.
- d. **Purpose of improvement in the use of the product/service.** Information about your device and network will be used to enhance the network connection experience. The collection and processing of user data for the purposes of relationship management, support and communication, complaint management, software maintenance and updating.
- e. **Purpose statistics and marketing.** Your personal data will also be processed for purposes related to or relevant to the activity performed by *DBL* and for the anonymous processing of statistics and market research related to demographic analysis on the use of the product.

Methods of treatment

The processing of your data is carried out electronically, through recording, processing, storage and transmission of data, including with the help of computer tools. The collected data will be uploaded to the cloud only after obtaining your explicit permission in the app. You can, at any time, delete your cloud data and/or stop a further collection by going to the App's Privacy Settings.

The tools and supports used to carry out the processing activities are suitable to guarantee the security and confidentiality of your data.

In carrying out its processing activities, *DBL* undertakes to:

- ensure the accuracy and updating of the data processed, and promptly receive any corrections and / or additions requested by you (as an interested party in data processing);
- take appropriate security measures to ensure adequate protection of your data, in view of the potential impacts that the processing involves on the rights and fundamental freedoms of the person concerned;
- notify you, in the times and cases provided for by the mandatory legislation, of any violations of your personal data;
- ensure that the processing operations comply with the applicable legal provisions.

Nature of data provision and consequences of refusal.

The provision of your personal data is optional, however, in the absence of the data requested (exclusively for the purposes indicated in the points above) the service requested or part of it cannot be performed and you cannot take advantage of the opportunities mentioned above.

Categories of recipients of personal data.

Your data will not be disclosed. Your data may be communicated, exclusively for the purposes mentioned above, to the following categories of subjects:

- the internal staff of *DBL*, as authorized person and/or data protection officer;
- companies belonging to the same group of *DBL*;
- service providers related to the product sale (e.g. logistics partners to provide delivery services, cloud service providers);
- persons, companies, who provide services or activities of assistance and advice to *DBL* in order to protect their rights;
- subjects whose right to access your data is recognized by law.

For security reasons, however, your personal data is subject to a pseudonymization process in such a way that the user cannot be identified in the first instance and without the use of further information.

Retention of personal data.

Personal data will be kept for a period not exceeding that necessary for the achievement of the purposes for which they were collected and subsequently processed.

After the expiry of the retention period, *DBL* will delete the data or make it anonymous within the prescribed time, unless otherwise required by law or regulation.

Contact details

The *data controller* is Dynamic Brain Lab LLC, which can be contacted at the following addresses:

- Postal address: 3-33-13 Kamimeguro, Meguro-ku, 153-0051, Tokyo Japan;
- e-mail address: privacy@dynamicbrainlab.com

Rights of the data subject.

At any time, you have the right, including in relation to profiling, to:

- ask the data controller for access to your personal data and information relating to the same; the amendment of inaccurate data or the integration of incomplete data; the cancellation of personal data concerning you; the limitation of the processing of your personal data;
- Request and obtain from the data controller - in the event that the legal basis of the processing is the contract or consent, and the same is carried out by automated means - your personal data in a structured format and readable by automatic device, also in order to communicate such data to another holder of the treatment (so-called right to portability of personal data);
- Oppose at any time to the processing of your personal data to the occurrence of special situations that affect you;
- Revoke your consent at any time, limited to cases where the processing is based on your consent for one or more specific purposes and concerns common personal data (e.g. date and place of birth or place of residence), or particular categories of data (e.g. data revealing your racial origin, political opinions, religious beliefs, health or sex life). Processing based on consent and carried out prior to the revocation of the same, however, retains its legality;
- Complaint to a supervisory authority.

Provision of consent to treatment

Having read the information, I express my consent to the processing of my personal data for the purposes indicated:

- A)** in points (a) and (b) (purpose of contractual performance) *.
- B)** in point (c) (security purposes).
- C)** in point d) (aim of improving the use of the product/service),
- D)** in point d) (statistical and marketing purposes),

* In case of denial of consent, it will not be possible to proceed with the registration on the app and its use.

Website Cookies

Our Use of Cookies, web Beacons and Similar Technologies

When you visit or interact with our Website, services, applications, tools or messaging, we or our authorized service providers may use cookies, web beacons, and other similar technologies to make your experience better, faster and safer, for advertising purposes and to allow us to continuously improve our sites, services, applications and tools.

We hope the information below provides you with clear and comprehensive information about the technologies we use and the purposes for which we use them, but if you have any additional questions, or require any additional information, please contact us at privacy@dynamicbrainlab.com

Your Consent

By continuing to use and navigate our Website, services, applications, tools or messaging, you are agreeing to our use of cookies, web beacons and similar technologies as described herein.

If you do not wish to accept these technologies in connection with your visit to or use of our Website, services, applications, tools or messaging, you may see additional options below available to you to manage, control or delete our, or our service provider's, use of these technologies.

What are Cookies, Web Beacons and Similar Technologies

These technologies are essentially small data files placed on your computer, tablet, mobile phone or other device ("collectively, a "device") that allows us to record information when you visit or interact with our websites, service, applications, messaging, and other tools. Though often these technologies are generically referred to as "Cookies," each function slightly differently, and is better explained below:

Cookies: These are small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. Cookies allow a website to recognize a particular device or browser. There are several types of cookies:

- I. *Session cookies* expire at the end of your browser session and allow us to link your actions during that particular browser session.
- II. *Persistent cookies* are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.
- III. *First-party cookies* are those set by a website that is being visited by the user at the time in order to preserve your settings (e.g., while on our site).
- IV. *Third-party cookies* are placed in your browser by a website, or domain, that is not the website or domain that you are currently visiting. If a user visits a website and another entity sets a cookie through that website this would be a third-party cookie.

When you enter a Website using cookies, you may be asked to fill out a form providing personal information; like your name, e-mail address, and interests. This information is packaged into a cookie and sent to your browser (Chrome, Firefox, etc.), which then stores the information for later use. The next time you go to the same website, your browser will send the cookie to the server. The message is sent back to the server each time the browser requests a page from the server.

Web beacons: small files (also called “pixels”, “image tags”, or “script tags”) that may be loaded on our sites, applications, and tools, that may work in concert with cookies to identify our users and provide anonymized data on their behavior.

Similar technologies: Technologies that store information in your browser or device utilizing local shared objects or local storage, such as flash cookies, HTML 5 cookies, and other web application software methods. These technologies can operate across all of your browsers, and in some instances may not be fully managed by your browser and may require management directly through your installed applications or device. We do not use these technologies for storing information to target advertising to you on or off our sites.

What types of cookies, web beacons and similar technologies do we use and why

Our cookies, web beacons and similar technologies serve various purposes, but are generally either necessary or essential to the functioning of our sites, services, applications, tools or messaging, help us improve the performance of or provide you extra functionality of the same, or help us to serve relevant and targeted advertisements. More specifically:

Strictly Necessary or Essential: 'Strictly necessary' or “essential” cookies, web beacons and similar technologies let you move around the website and use essential features like secure areas and shopping baskets. Without these technologies, services you have asked for cannot be provided. Please note that these technologies do not gather any information about you that could be used for marketing or remembering where you've been on the internet. Accepting these technologies is a condition of using our Website, services, applications, tools or messaging, so if you prevent these from loading we can't guarantee your use or how the security therein will perform during your visit.

Performance: 'Performance' cookies, web beacons and similar technologies collect information about how you use our website e.g. which pages you visit, and if you experience any errors. These cookies do not collect any information that could identify you and is only used to help us improve how our website works, understand what interests our users and measure how effective our content is by providing anonymous statistics and data regarding how our website is used. Accepting these technologies is a condition of using our Website, services, applications, tools or messaging, so if you prevent these from loading we can't guarantee your use or how the security therein will perform during your visit.

Functionality: These cookies, web beacons or similar technologies are used to provide services or to remember settings to improve your visit.

Advertising: First or third-party cookies and web beacons may be placed by our sites, applications, or tools, in order to deliver content, including product related advertisements, relevant to your specific interests on our sites or third-party sites. These technologies allow us to understand how useful our advertisements are, and improve the relevancy of the content delivered to our users.

We also utilize 3rd. party service providers to assist us in delivering on the same functions, which means that our authorized service providers may also place cookies, web beacons and similar technologies on your device via our services (first- and third-party cookies). They may also collect information that helps them identify your device, such as IP-address, or other unique or device identifiers.

How to manage, control and delete cookies, web beacons and similar technologies

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) it may limit your use of certain features or functions on our Website or service.

Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site. Please note, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser.

Internet browsers allow you to change your cookie settings. These settings are usually found in the 'options' or 'preferences' menu of your internet browser. In order to understand these settings, the following links may be helpful. Otherwise you should use the 'Help' option in your internet browser for more details.

Cookie settings in Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Cookie settings in Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Cookie settings in Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Cookie settings in Safari: https://support.apple.com/kb/ph19214?locale=en_US

If you wish to withdraw your consent at any time, you will need to delete your cookies using your internet browser settings.

More information about cookies

Useful information about cookies, including information about deleting or blocking cookies, can be found at: <http://www.allaboutcookies.org>

A guide to behavioral advertising and online privacy has been produced by the internet advertising industry which can be found at: <http://www.youronlinechoices.eu>

The information contained in this web site is subject to update without notice.

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Legal: Privacy Policy