



Privacy Policy – Website & Mobile Applications

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Please read our Privacy Policy carefully as it explains the following:

- What personal information we collect from you and for which purpose (Section 3 and 4)
- The measures to safeguard the access to and the security of your Personal Data (Section 5)
- Your rights to access, rectify, erase your Personal Data and object to the processing of your Personal Data (Section 8).

In order to use the Products, you must first acknowledge and agree to our Privacy Policy. You cannot use the Products without first accepting our Privacy Policy.

1. General

Epihunter provides the Epihunter Application, a set of tools and applications for people with epilepsy and their relatives and caregivers to improve their quality of life. The Epihunter Application consists of the Epihunter Platform, the Epihunter Mobile Applications and the Epihunter Dashboard (each as defined hereinafter and collectively the "Application"). The Platform is the engine of the Application and interacts with and transmits data between the Mobile Applications and Dashboard. In addition, the Platform also analyses and stores data. The Dashboard is an online tool with the sole intention to display, add and store your data. The Mobile Applications interacts with third-party EEG headsets and the user to capture, analyze and display data and forward it to and receive it from the Platform.

The Results (as defined hereinafter) are automatically transferred to the Dashboard through the Platform.

Epihunter NV ("Epihunter", "we", "us") recognizes and understands the importance of the privacy of its users ("users", "You") and wants to respect their desire to store and access personal information in a private and secure manner. This Privacy Policy applies to our Application and our Website (collectively the "Products") and describes how Epihunter manages, stores and utilizes your Personal Data through its Products.

In order to use our Products, we require you to consent to the collection and processing of your Personal Data before you start using the Products. If you do not agree with the terms of this Privacy Policy, you may not use the Products in any manner.

Epihunter is committed to protecting the privacy of all of its users Personal Data and providing a secure, user-controlled environment for the use of the Products in accordance with the the Belgian Privacy Law of 30 July 2018 on privacy protection in relation to the processing of personal data; and the EU Regulation of 2016 ('GDPR') concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC. At the same time, you also share responsibility for maintaining privacy and security for example, by not allowing any third party to use your personal account on the Epihunter Mobile Application and Epihunter Dashboard. Epihunter asks all users to be responsible for safeguarding any authentication information and to immediately notify Epihunter of any unauthorized use of your personal Account.

Please read this Privacy Policy carefully (which is also available on our Website: www.epihunter.com) so that you fully understand how we obtain and process your Personal Data. By accepting this Privacy Policy, you acknowledge and agree that you were adequately informed of the functioning and objectives of the Application.

2. Definitions

- "Account" means your account registered through the registration process on the Epihunter Mobile Application or Epihunter Dashboard
- "Application" means the (i) Epihunter Platform; (ii) Epihunter Mobile Application and (iii) Epihunter Dashboard
- "Epihunter Dashboard" means the dashboard made available to the users, located at my.epihunter.com
- "Epihunter Mobile Application" means the mobile application (i) which the user has to download on its mobile device and (ii) is intended to record (via third-party EEG headsets and user input), display, analyze, store and transmit your epilepsy data
- "Epihunter Platform" means the platform on which the Epihunter Mobile Application and the Epihunter Dashboard are connected and collectively function. Depending on the user profile different application functions can be made available
- "Products" means the Application, Website and Documentation
- "Results" means the raw EEG data and the results of the analysis by the Epihunter Platform of the EEG data recorded by the User through the Epihunter Mobile Application
- "Insights" means the data collected via the application and rendered in an optimal way by the Epihunter Platform through the Epihunter Mobile Application and Epihunter Dashboard.
- "Third Parties" means any natural or legal person or entity other than Epihunter
- "Website" means the website available at www.epihunter.com

3. Information we collect

We may collect several types of personal information from the users of our Products, and store it on your mobile device and/or our server such as:

- Contact information (e.g. your name, postal address, e-mail address, and mobile or other telephone number)
- The profile data provided by you on your account such as your name and profile picture
- Information in helpdesk support inquiries
- Patient demographics such as date of birth and gender

- Information about your device, such as its model, unique device identifier and operating system version
 - Information collected by manual input by the Application, such as seizure onset, etc.
 - Payment information such as transaction identifiers and summary information that does not include credit card or bank account numbers (we do not collect or store financial account information)
 - Information from third party EEG devices such as EEG signals, headset identification, etc.
 - Video and audio information, as recorded by the mobile application
- Web behavior information such as information related to how the users use the Products (e.g. browser type, domains, page views) collected through cookies and other automated technology (cfr. Section 6 "Cookies").

Hereinafter collectively "Personal Data".

We shall store your Personal Data on our servers located in the European Economic Area (AWS - Frankfurt - Germany).

We would like to draw your attention to the fact that Personal Data consisting of patient medical data is also protected by medical secrecy rules.

4. How do we use your Personal Data

Epihunter (i) collects, (ii) uses, (iii) maintains and (iv) may share your Personal Data provided by you or collected by us with its affiliates, parent companies or other related companies for all purposes necessary to ensure the proper functioning and operation of the User accounts and/or the proper functioning of the Products.

These purposes may include (collectively the "Purpose"):

- Creating and managing your Account to use the Application;
- Providing information and allowing the Users access to the Products;
- Diagnosing technical problems and managing technical support and processing inquiries concerning the Products;
- Contacting the Users by phone, email, text message or push notifications (if they are enabled) to (i) verify your account (ii) for information and operational purposes such as account management, instructions, alerts, reminders, customer service, system maintenance and others
- Contacting the Users to (i) communicate about, and organize your participation in market research or (ii) obtaining testimonials;
- Commercializing the Application;
- Performing data analyses (including anonymization and aggregation of Personal Data) and using and sharing the resulting data to third parties for commercialization purposes;
- The operation, evaluation and improvement of the Products (including the development of additional products and/or services, enhancing and improving the current Products, analysis of our Products, quality control activities and performing internal business functions such as accounting and auditing);

- Protecting against, identify and prevent fraud and other unlawful activity, claims and other liabilities;
- Complying with and enforcing any applicable legal obligations with respect to our Terms of Use and Privacy Policy.

Furthermore, you agree that Epihunter is free to access, retain, and disclose Personal Data in the following events:

- In order to be in compliance with any applicable legislation or regulations;
- If a law enforcement authority or other government official requests so;
- To enforce the Epihunter Terms of Use or Privacy Policy
- The investigation of any suspected or actual fraudulent or illegal activity and
- To protect your or our safety and/or rights.

By using the Application, you acknowledge and explicitly agree that we may disclose certain information to vendors and service providers who help us provide the Products. Examples of these vendors and service providers include entities that process credit or debit card payments and provide analytics and web hosting services.

By using the Application, you acknowledge and explicitly agree that we may disclose certain information to providers that build profiles to improve the diagnostic capabilities of the Application. We will not share your information without your permission.

By using the Application, you acknowledge and explicitly agree that, with your permission, we will share some health-related information, with third party devices and services, such as Apple health and Google Fit. If you connect your Epihunter account to a third-party device or service, you may be asked to share your information with that application. We will not share your information without your permission.

You furthermore understand and agree that the technical processing and transmission of the Products, including your Personal Data, may involve (i) transmissions over various networks; and (ii) modifications to conform and adapt to technical requirements of connecting networks, or devices .

5. Security

Epihunter shall take appropriate administrative, technical and organizational measures against unauthorized or unlawful processing of any Personal Data or its accidental loss, destruction or damage, access, disclosure or use. Upon written request, Epihunter can provide you with a list of people of Epihunter that may have access to your Personal Data.

These people have entered into confidentiality agreements prior to having been granted access to your Personal Data. In the event of and following discovery or notification of a breach of the security of the Personal Data, or access by an unauthorized person, Epihunter is required by law to notify the user if the breach is likely to affect your privacy.

6. Cookies

When using the Products, we may collect certain information by automated means, such as cookies (small text files stored in your browser) and similar technologies, including mobile application identifiers, to improve your experience of the Products, increase security, measure use and effectiveness of the Products, identify and resolve issues and marketing purposes. We may also use cookies and other automated means for purposes such as management of our Products and other aspects of the commercialization of our business.

The information we collect in this manner includes IP address, browser characteristics, device characteristics, operating system version, information on actions taken on our Products (such as usage, activity logs and click-throughs), and dates and times of visits. Log data is deleted on a regular basis.

You can control cookies through your browser settings and other tools. Your device may offer you control over the use of cookies or other technologies when you use the Products. For example, you may be able to set your device or browser to disable, clear, reset or block the use of cookies or similar technologies. Please note, however, that without cookies the Products may not work properly or you may not be able to use all of their features.

Third parties may also use cookies to collect information about your activities on our Products to understand and continue improving the performance of our Products. Please check the relevant third party website for more information about their use of cookies. Where this site allows such cookies to be set or you access other websites from the Products using the links provided, the operators of these websites will use cookies in accordance with their own cookies policy, which may differ from our.

More information about cookies set by third parties:

- [Cloudflare](#)
- [Facebook](#)
- [Google AdSense](#)
- [Google Analytics](#)
- [Google Tag Manager](#)
- [Hotjar](#)
- [HubSpot](#)
- [Linkedin](#)
- [Stripe](#)
- [Twitter](#)

By continuing to use our Products, you consent to the placement of cookies and other automated means in your browser and device in accordance with your cookies settings on our platform and this Privacy Policy.

7. Disclosure to Third Parties

In the event of full or partial merger with, or acquisition of all or part of Epihunter, we may transfer your Personal Data to a Third Party. In such an event, Epihunter shall impose this Third Party to use any Personal Data strictly consistent with this Privacy Policy.

Other than as set out in this Privacy Policy, we shall not sell or otherwise disclose your Personal Data to Third Parties without obtaining your prior explicit consent unless this is necessary for the purposes set out in this Privacy Policy or unless we are required to do so by law.

We may also share Personal Data with Third Party service providers who help us to provide, understand, commercialize and improve our Products. We do not authorize these Third Party service providers to use or disclose your Personal Data except as strictly necessary to perform any services under our supervision or to comply with applicable legislation. We seek to provide any such Third Party service provider with only the Personal Data they need to perform their specific function.

In any event, such Third Party service providers shall be obliged to treat your Personal Data in accordance with this Privacy Policy. However, Epihunter cannot be held liable for any damages, whether direct or indirect, that may result from the misuse of your Personal Data by such Third Party service providers.

8. Your rights

Right of access - If you are concerned or have any questions about your Personal Data, you have the right to request access to the Personal Data which we hold or process about you. We will then provide you with information about the data that are being processed and on the source of those data.

Right of rectification and right of erasure You have the right to request us free of charge to correct, erase or block any inaccuracies in your Personal Data if such Personal Data would be incomplete, inaccurate or processed unlawfully.

Right to not be subject to automated individual decision making You have the right to request us not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Right to object to data processing Without prejudice to the termination provisions of the Terms of Use, you may withdraw at any time your consent to the processing of your Personal Data by Epihunter by permanently removing the Application and notifying us in writing thereof via info@epihunter.com . Upon receipt of this notification, Epihunter shall promptly stop any processing of your Personal Data. You may also ask us to stop using your Personal Data for direct marketing purposes.

To exercise your abovementioned rights or any other questions concerning this Privacy Policy, please contact us by e-mail or in writing on the address below. You should add a copy of your identity card or other proof of your identity to your request. Epihunter will undertake the necessary action without undue delay and provide information on action taken (or the absence of any such action) within 30 days.

You may also lodge a complaint with a supervisory authority in case of breach of the applicable privacy laws by Epihunter.

9. Data retention

and deletion We may retain information regarding you and your use of the Products, including Personal Data, for as long as reasonably needed to provide you with the Products and the uses described in this Privacy Policy.

Please note that we retain your Personal Data even if you temporarily stop using the Application until you permanently delete the Application on your mobile device and notify us thereof. Upon notification, we may retain and continue to use and disclose your Personal Data to Third Parties exclusively on a fully anonymized basis.

10. Third Party websites or applications

You acknowledge and agree that certain content or services provided by Third Parties may be made available to you through the Products. You agree that such linked content or services may have their own privacy policies for which Epihunter cannot be held responsible. Epihunter does not in any way review or endorse the privacy practices of such Third Parties.

11. Updates or changes to our Privacy Policy

Occasionally, we may change or update this Privacy Policy to allow us to use or share your previously collected Personal Data for other purposes. If Epihunter would use your Personal Data in a manner materially different from that stated at the time of the collection, we will provide you with a notice on our Website and in our Epihunter Mobile Application indicating that the Privacy Policy has been changed or updated and request you to agree with the updated or changed Privacy Policy.