

# Privacy policy

2021-01-25

While processing your personal data, NephroGo complies with the General Data Protection Regulation, the Law on Legal Protection of Personal Data of the Republic of Lithuania, as well as with the requirements for the processing of personal data set out in other legal acts. We point out that the processing of data of the NephroGo website and app users is lawful, transparent and fair, for the purposes set out in advance and only to the extent necessary to achieve the purposes. When we process personal data, we aim to keep it accurate, secure, confidential, properly stored and protected.

## **What is NephroGo's privacy policy?**

The NephroGo privacy policy (hereinafter - Privacy policy) is a document that sets out what personal data we collect from users of our website and the NephroGo app and from persons who contact us in any other way (hereinafter - NephroGo users), why and how we do this, how we ensure the privacy of personal data, and what rights NephroGo users have and how they can exercise them. The purpose of this Privacy policy is to inform NephroGo users about the processing of their personal data in a concise, transparent, clear and understandable manner. The NephroGo Privacy policy is easily, accessibly and free of charge on the NephroGo website at [www.nephrogo.lt](http://www.nephrogo.lt).

## **What is personal data?**

Personal data is information that can identify a specific natural person, either directly or in combination with other data, such as name, date of birth, address or e-mail address. In addition, data about the behavior of a website user is also personal.

## **What is NephroGo?**

The controller of the personal data specified in the Privacy policy is Giedrė Žulpaite, medical student at the Faculty of Medicine of Vilnius University, e-mail: [giedrezulpaite@gmail.com](mailto:giedrezulpaite@gmail.com) and Karolis Vyčius, e-mail: [k.vycius@gmail.com](mailto:k.vycius@gmail.com).

## **What information do we collect from users?**

The NephroGo app receives and processes personal data during registration: gender, date of birth, height, weight (dry weight for dialysis patients), number of years of suffering from chronic kidney disease, stage of chronic kidney disease, type of dialysis being performed, type of diabetes, number of years of suffering from diabetes, and information on diabetes complications. The NephroGo app collects data on the food consumed by the user and the quantity of food consumed. User-input health indicators are collected and analyzed: blood pressure, body weight, urine output amount, severity and localization of swelling, well-being, appetite, shortness of breath and blood glucose concentration levels.

We use an interface with social networks to collect information by logging in through Facebook or Google accounts. During the registration process on the NephroGo app, when you sign up via your "Facebook" or "Google account", the personal data you have provided in your public profile on the respective social network (name, surname, email address, profile picture) are received and processed. This personal data is processed for the following purposes: for the creation of your account on the NephroGo app; for the administration and technical support of your account, including your identification when you log in to your account and troubleshooting, password reminders, and for the use of your email address for the purpose of NephroGo contacting you directly.

### **Which third-party services are used?**

Your personal data will be kept strictly confidential. The information we disclose to the third parties listed below is not excessive in relation to the services provided by these third parties:

Your ID, your hardware and application ID, the actions you take, the timing of those actions, the model of the hardware, the name of the operating system are used in Firebase Analytics, Datadog, Sentry, NephroGo for analytics purposes and to monitor performance;

For NephroGo, we use a social networking interface to log in via Facebook, Apple or Google accounts. During the registration process in the NephroGo app, when you register by logging in through your "Facebook", "Apple" or "Google" account, the personal data that you have provided in your public profile on the relevant social network (name, surname, email address, your profile picture) are received and processed. Such personal data is stored with our login service provider Firebase Authentication and on our servers. This personal data is processed for the following purposes: for the creation of your account on the NephroGo app; for the administration and technical support of your account, including your identification when you log in to your account and troubleshooting and password reminders.

### **What cookies or similar technologies do we use?**

The websites [www.nephrogo.com](http://www.nephrogo.com) and [www.nephrogo.it](http://www.nephrogo.it) use Google analytics cookies to analyse usage. The website may also use cookies placed by third parties in connection with the use and settings of your browser service providers. We are not and cannot be held responsible for the placement of these cookies and the information they collect, as they are placed independently of the Controllers.

### **What is the purpose and legal basis for collecting the information?**

The information is collected and analyzed to provide the right service: to help people with chronic kidney disease to eat well, to monitor their electrolyte, fluid and energy intake, and to actively monitor their health status and changes in it. The information collected during registration about the user's health status helps to personalize the service and helps the NephroGo app to calculate the exact amounts of energy, protein, fluid, sodium, potassium, phosphorus needed for a specific user. The nutrition summary helps the user to keep track of his diet and daily intakes, deficiencies and excesses. The collection of health indicator data is needed to help the user to monitor the dynamics of his health status, to highlight changes earlier, and to promote self-monitoring and self-management of the user's illness.

The depersonalized and aggregated data is used for the 2014-2020 Operational Program for

Investment of European Union Funds, Priority 9 "Public Education and Developing the Potential of Human Resources" 09.3.3-LMT-K-712 measure "Development of scientific competence of scientists, other researchers, students through practical scientific activities" funded by the project "Development of a mobile application for dietary correction and monitoring of vital signs in dialysis patients suffering from chronic kidney disease" No. 09.3.3.3-LMT-K-712-22-0156 for the purpose of the scientific analysis of the data, in order to assess the functionality of the application NephroGo, the quality of the service, the need for it, and the potential for its improvement. The personalized and aggregated data is used to produce scientific publications.

We also use Firebase analytics in the NephroGo mobile app for statistical purposes to measure the popularity of the app and the usage of individual app components.

The legal basis for the processing of personal data is the consent of the NephroGo user. Before registering on the NephroGo website or app, the NephroGo user must read and agree to the NephroGo Privacy policy and Rules of Use, and therefore, by being duly informed by us, by their free will and by their active actions, by registering on the website or app, the NephroGo users consent to the processing of the personal data they provide to the NephroGo accordingly.

### **How do we protect personal data?**

Personal data is not transferred to third parties and is not made public, except as provided in this Privacy policy or as provided by law.

We ensure that the personal data of NephroGo users is processed in such a way that, by means of appropriate technical or organizational measures, adequate security of the personal data is ensured, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

However, we reserve the right to provide information about NephroGo users if we are required to do so by law or if we are requested to do so by law or are lawfully requested by law enforcement authorities or authorities responsible for performing criminal prosecution.

To the extent necessary, we may disclose data collected about NephroGo users to third-party service providers whose services we generally use for data storage, telecommunications and website hosting purposes.

The above service providers are limited in their ability to use NephroGo users' data and may not use this data for purposes other than to provide services to us.

### **How long do we keep personal data?**

We do not store the personal data of NephroGo users for longer than the purposes of data processing specified in this Privacy policy or provided for by law, if a longer data retention period is stipulated therein. NephroGo users' personal data from their social networking accounts is stored until the user deletes their account. To delete an account, the user can contact NephroGo representatives by email.

### **What are your rights as a user of the website and the NephroGo app?**

As a data subject, you have the following rights:

- to know (be informed) about the processing of your personal data;
- to have access to your personal data that we process;
- to request the rectification or completion, clarification of incorrect/inaccurate/incomplete personal data relating to you;
- to require the destruction of your personal data when it is no longer necessary for the purposes for which it was collected;
- to require the destruction of your personal data if they are processed unlawfully or where you withdraw or withhold your consent to the processing of personal data, which is necessary;
- to object to the processing of your personal data or to withdraw your prior consent;
- to require to provide, where technically feasible, your personal data collected pursuant to your consent or for the purposes of the performance of a contract, in an easily readable format, or to request that it be transferred to another controller.
- to lodge a complaint with us or the State Data Protection Inspectorate if you believe that your rights as a personal data subject have been and/or may be violated.
- You can make requests to us regarding the exercise of your rights in person, by post or by means of electronic communication. Upon receipt of your request (application), we may ask you to provide proof of identity, as well as other additional information we need in connection with the request, which we undertake to delete after identification.

Upon receipt of your request, we will respond without undue delay, but no later than 30 calendar days from the date of receipt of your request and the date of submission of all the documents necessary to provide the response.

### **Is NephroGo responsible for the data processed by partner websites?**

The NephroGo website may contain links to other websites, such as our partners' websites or websites that may be relevant to NephroGo users. If you follow such links to any of the websites, please note that these websites and the services available through them have their own separate privacy policies and that NephroGo does not accept any responsibility or liability for these policies or for the personal data, such as contact or location data, collected on these websites or through the provision of services. Please review the policies of those websites before submitting personal data to those websites or using any of their services.

### **How will we inform you about changes to the Privacy policy?**

We may update or change this Privacy policy at any time. Such an updated or modified Privacy policy will take effect from the date of its publication on our Website. NephroGo users will be informed of any changes and/or additions to the Privacy policy by posting the new version of the Privacy policy on [www.nephrogo.it](http://www.nephrogo.it) and [www.nephrogo.com](http://www.nephrogo.com), making it technically possible for NephroGo users to read the new version of the Privacy policy.