

Privacy Policy 2021

Last updated: November 16th, 2021

Introduction

In this Privacy Policy PauseAble ApS (“PauseAble” or “we”, “us”, and “our”), wants to inform you about how we collect, use and disclose personal data from and about you, when you sign up to or use our application Pause (“the App”).

1. About PauseAble

At PauseAble we believe that extraordinary, intuitive and research based technology can help millions of people prevent and prevail over stress.

Therefore we have developed digital training programs that effectively improves the user’s stress resilience. The product is offered to users through app stores, enterprises and partners in the health insurance sector.

When you use our training programs and the App Pause will collect and process certain personal data about you as further described in this Privacy Policy.

Personal data means any information relating to you including information which can either directly or indirectly tell us who you are (e.g. your full name or email address, information about your health, your mobile device and so on).

We are the data controllers of the personal data we collect from and about you through the App.

This Privacy Policy apply to all users who have registered with or subscribed to the App.

2. What type of personal data do we collect about you?

We collect (1) registration data, when you sign up to the App, (2) information about the training program you choose and your progress in the such training programs (3) information about your body movements (4) information about your breathing, (5) information about your pulse, and (6) activity data when you access and interact with the App.

More in particular, Pause collects the following types of data from and about you:

- Registration data is the information you submit to register for the App. Registration Information may include, for example, name, surname, email address, gender, country, postcode, birthday date and association.
- Training program is information about which of our training programs you are or have been using and your progression through these programs.
- Body movements: is data about the speed and position of mindful movement of your body including minor movements such as finger touch and breathing, as well as larger movements such as mindful walking or arm movements. These movements data are collected through touch sensors, motion sensors, and camera sensors of the mobile device. These data enable us to calculate the degree of your focused attention, and allow us to give you feedback during training, insights after the training as well as improve our algorithms and app.
- Activity Data is when you access and interact with the App, we may collect certain information about those interactions. For example, in order to permit your use of the App our servers receive and record information about your device, including potentially your IP address, browser type, and other software or hardware information, and maybe including a unique device identifier assigned to that device. We may also collect and store information about your usage of the App, such as features you have used, content you have viewed and similar.

3. For what purposes do we use your personal data?

We use the personal data we collect from and about you to:

- Administrate the App
- Provide the App and its features (including training programs) to you;
- Measure and improve the App and its features;

- Improve your experience with the App by delivering content you will find relevant and interesting;
- Provide you with user support and to respond to inquiries;
- Protect the rights of PauseAble and others: more in particular there may be instances when PauseAble may use your personal data, including situation where PauseAble has a good faith belief that such processing is necessary in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of PauseAble or our employees, agents, contractors, licensors and suppliers (including enforcement of our agreements and our terms of use); (ii) protect the safety, privacy, and security of users of the App or members of the public; (iii) protect PauseAble, as well as other third parties involved, such as our suppliers, against fraud or for risk management purposes;
- Comply with the law or legal process; or respond to requests from public and government authorities;
- Complete a corporate transaction, such as a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Company business, assets or stock (including in connection with any bankruptcy or similar proceedings). For example if PauseAble is involved in a merger or transfer of all or a material part of its business, PauseAble may transfer your information to the party or parties involved in the transaction as part of that transaction;
- Upon your prior consent, send to you - via email, SMS, telephone, chat and social media - offers, promotions and other marketing communications regarding the App and/or third parties services / products operating in the following sectors [*], including group companies and co-branded services or features, such as contests or other promotions arranged together with a third party or Company Affiliate that may be hosted on the App or on PauseAble Affiliate or third party's services;

We may use anonymised personal data or information that does no longer identify you personally, even indirectly (e.g. statistics) for additional purposes or share it with third parties.

4. Data obtained through Apple HealthKit APIs and Motion & Fitness APIs

Apple HealthKit data only used to provide health, motion or fitness services in connection with the App; HealthKit data will not be used for marketing, advertising or use-based data mining, including by third parties

5. On what legal basis do we process your personal data?

We only process your personal data if such processing can take place in accordance with the rules laid down in the current data protection law applicable at all times.

On the 25 May, the EU General Data Protection Regulation 2016/679 (the “Privacy Regulation”) takes effect.

The processing of your not sensitive data is based on the following legal bases of the Privacy Regulation:

- The processing is necessary for the provision of the App and therefore it is mandatory since otherwise the services could not be provided cf. the Privacy Regulation article 6(1)(b);
- The processing is mandatory as it is requested under applicable laws cf. the Privacy Regulation article 6(1)(c);
- The processing of your personal data is performed on the basis of the legitimate interest of PauseAble or of our counterparties which is adequately balanced with your interest cf. the Privacy Regulation article 6(1)(f). This data processing activity is not mandatory and you can object at any time through the modalities as per Section 8 of this Privacy Policy.

The processing of your sensitive data is based on the following legal basis's

- The processing is based on your explicit consent cf. the Privacy Regulation article 9(2)(a). Please be aware that without your consent, it is impossible for PauseAble to make the training programs in the App available to you. You can revoke your consent to the processing of your personal at any time by sending a communication to info@pauseable.com

- Processing is necessary for the establishment, exercise or defence of legal claim cf. the Privacy Regulation article 9(2)(f).

6. How do we process your personal data?

With regard to the above-mentioned purposes, the data is processed through electronically and by manual means, and is protected through adequate security measures, taking into account the state of art, the costs of implementation and the nature, scope, context and purpose of processing as well as the risk of varying likelihood and severity for the rights and freedoms of individuals.

With this regards, PauseAble uses appropriate administrative, technical, personnel and physical measures to safeguard personal data in its possession against loss, theft and unauthorised use, disclosure or modification.

7. Who have access to your data?

For purposes consistent with the purposes as per Section 3 of this Privacy Policy, PauseAble may share your personal data to the following categories of recipients located within the European Union or outside of the European Union in compliance and within the limits of the provisions of Section 8 below:

Third parties service providers entrusted with processing activities and duly appointed as processors when required by applicable laws, e.g. cloud service providers, other entities of the group, providers of services instrumental to or supporting the App - and thus, by way of example and without limitation, companies that provide IT services, experts, consultants and lawyers - companies resulting from possible mergers, demergers, or other transformations, and Competent national authorities in order to comply with applicable laws.

8. Is your personal data transferred abroad?

Your personal data may be transferred to countries within and outside the European Economic Area.

If your personal data is transfers to a country outside the European Economic Area we will make sure, that appropriate and suitable safeguards designed to protect your personal data is put in place.

In any other case where personal data is transferred to a country outside the European Economic Area we will put in place appropriate and suitable safeguards designed to protect your personal data and the transfer of your personal data in compliance with applicable data protection laws, such as standard contractual clauses adopted by the European Commission as per Articles 45 and 46 of the Privacy Regulation.

9. What are your rights with regard to your personal data?

You have the right, at any given time, to be informed of what personal data we process about you, to verify its accuracy or request rectification, update or amendments of your personal.

To some extent you also have the right to request us to limit the processing of your personal data, to object to the processing and to request the erasure of your personal data.

When the personal data is processed by automatic means and the processing is either (i) based upon your consent or (ii) the fact that the processing is necessary for the provision of the App, you have the right to receive an electronic copy of your personal data, which you have provided to us ("data portability").

We give you also choices regarding our use and disclosure of your personal data for marketing purposes. You may revoke your consent, in any given time, for receiving electronic communications from us. If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out of receiving these marketing-related emails by following the unsubscribe instructions in our communications. You may also send a request to the address of

Section 11 of the Privacy Policy. In any case PauseAble may continue to send you administrative communications related to the provision of the App.

When you make a request to us please include your email address, username, name, address, and telephone number and specify clearly what information you would like to access, change, update, suppress or delete.

In all the above cases, we may contact you and ask you for more information, that are necessary to properly handle your request.

You also have the right to lodge a complaint with a supervisory authority in your Member State. In Denmark, the supervisory authority is the Danish Data Protection Agency:

The Danish Data Protection Agency

Borgergade 28, 5.

DK-1300 Copenhagen K

+45 33 19 32 00

dt@datatilsynet.dk

10. Retention period applying to your personal data

We will retain your data only for the period necessary to fulfil the purposes for which the data was collected as outlined in this Privacy Policy.

Data collected will as a main rule be retained until you cancel your account, or if you ask us to delete your personal data.

Remember that even after you cancel your account, or if you ask us to delete your personal data, copies of some information from your account may remain viewable in some circumstances where, for example, when retention of such copies is necessary to comply with legal obligation or legal defense.

We may also retain backup information related to your account on our servers for some time after cancellation or your request for deletion, to comply with applicable law or legal defense.

At the end of the retention period your personal data will be either cancelled, anonymized or aggregated.

11. Update to this Privacy Policy

PauseAble may modify or update this Privacy Policy for any reason (including, but not limited to, changes in applicable law and interpretations, decisions, opinions and orders relating to such applicable law). Please look at the Effective Date at the top of this Privacy Policy to see when it was last revised.

Any changes to this Privacy Policy will be notified in advance by posting the revised Privacy Policy on in the App.

If we make material changes to this Privacy Policy that change the nature or processing or expand our rights to use the personal data we have already collected from you, we will notify you in advance and provide you with a choice about our future use of the personal data, as may be required by applicable law.

12. Contact Us

If you have questions about this Privacy Policy, please contact PauseAble at: PauseAble ApS

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