

## **END USER PRIVACY POLICY FOR THE PRIAID-SERVICES SUCH AS SYMPTOM CHECKER (via the API, components and other services)**

Data protection is a question of trust, and your trust is important to us. We respect your private and personal sphere. Protection, as well as the legally compliant collection, processing or utilisation of your personal data is of great concern for us. To make sure that you feel safe while using the priaid-Services such as the Symptom Checker via the API, components and other services of priaid AG (inc.) (collectively the “priaid-Services”) as part of your Platform Operator’s services, we use your personal data only according to legal requirements and like to inform you in the following about data collection and data usage.

You can print or save this document by using the normal functions of your internet provider (=Browser: usually “File” -> “Save as”). You can also download and archive this document as a pdf-file by clicking [here](#). You need the free program Adobe Reader ([www.adobe.de](http://www.adobe.de)) or similar programs that run pdf-formats, to open the pdf-file.

By agreeing to your Platform Operator’s privacy statement (privacy policy), which includes the following Privacy Policy for the priaid-Services, you are giving your consent that priaid AG (inc.), Sonnenbergstrasse 17, 8835 Feusisberg, Switzerland collects, processes and utilises your personal data according to data protection laws and the following policy.

**Note: priaid does not collect or store any personal data, i.e. any data relating to an identified or identifiable natural person, while you are using the priaid-Services as part of your Platform Operator’s services. Therefore, priaid cannot answer any privacy requests as we are not able to identify you as the End User, who is owner of the data.**

**Please submit your privacy requests to your Platform Operator.**

Although we do not collect or store your personal data we have still decided to create this Privacy Policy so that you as the End User can read, what kind of data is utilized by priaid for which purpose.

Responsible Office

Responsible for collection, processing and utilisation of your personal data is according to the respective data protection laws the priaid AG, Sonnenbergstrasse 17, 8835 Feusisberg, Switzerland.

If you wish to object to priaid AG’s collection, processing and utilisation of your personal data under this Privacy Policy in total or for separate measures, please send your objection in writing to:

priaid AG  
Sonnenbergstrasse 17  
8835 Feusisberg  
Switzerland

E-Mail: [privacy@priaid.ch](mailto:privacy@priaid.ch)

The presented Privacy Policy is an integral part of the Terms of Use of priaid AG (“API Operator” or “priaid”). Your Platform Operator (“Platform Operator”) has chosen to use the priaid-Services as part of his own services and thus must ensure the compliance with the Terms of Use as well as Privacy Policy of priaid. Therefore, this Privacy Policy applies between you as the End User (“You”, “I”, “End User” or “User”) of the Platform Operator’s service (products and services of your Platform Operator including the priaid-Services) and the Platform Operator with regard to the priaid-Services.

To provide products and services user-oriented and appropriately, priaid depends on collection and utilisation of non-identifiable user data. Especially personal medical data that are stored on the priaid-platform are sensitive; therefore, priaid protects them most efficient and secure. The API Operator treats data confidentially and keeps it in line with Swiss and European data protection laws with regard to the priaid-Services. The respective law ensures that self-determination is pertained and each individual’s privacy is secured when utilising user data. Therefore, priaid set up a data protection concept. It consists of three parts:

- (1) Collection, processing and utilisation, (2) transfer and security, and (3) access.

In the following you will find information about how we deal with your data and information. Some parts are referred to as End User (“You”, “End User” or “User”, e.g. end-consumer, potential patient of a healthcare service) or Platform Operator (“Platform Operator”, “corporate customer”, “customer”, e.g. operator of a healthcare oriented service or platform, healthcare company, healthcare provider, healthcare professional). Please refer to the Terms of Use of priaid AG for more detailed information.

## 1. Collection, processing and utilisation of personal data

### 1.1. *Personal data*

Personal data are data on the personal circumstances of an identified or identifiable individual. These include for example your name, your telephone-number, your address as well as all inventory data you provide.

### 1.2. *Collection, processing and utilisation of your personal data*

priaid does not collect or store any personal data while you are using the priaid-Services as part of your Platform Operator’s services.

### 1.3. *Which data are generally collected?*

Your Platform Operator may ask for personal information on different occasions, e.g. when you are using their products or services (e.g. booking of an appointment or usage of the appointment-module by the user, requests for consultations with a doctor or healthcare provider or medical request), however priaid doesn’t collect these personal data.

When using the priaid-Services, priaid collects data in various ways for the priaid-Services and the user will be asked to submit the following data:

- a. Year of birth and gender
- b. Specific health data (information about the currently existing complaints that are the reason for using the priaid-Services)
- c. General health data (body height, weight, smoker/non-smoker, medication, allergies, medical history)
- d. Additional information: doctor in charge (optional)

The disclosure of these data by the user is voluntary. Certain functionalities of products and services (e.g. medical request) may only be possible, when the user enters certain data.

The API Operator performs internal assessments regarding the users’ interests and behaviour based on information provided and via log-files. This is being done to provide the users with improved products and services. These informations are collected and analysed on an anonymized basis.

Information practices by third parties who have a link to the priaid-Services, who are accessible through the priaid-Services or who access the priaid-Services are not subject to this Privacy Policy. Please refer to the terms and conditions (terms of use) and/or privacy statement (privacy policy) of those third-party-providers.

### 1.4. *Right of Objection*

You can object anytime to use of your personal data entirely, or to individual measures, without incurring any costs other than the transmission costs in accordance with the basic tariffs. A written notice to the contact address mentioned in paragraph 4.1 (e.g. email, mail) is sufficient. **However please consider that priaid does not collect or store any personal data while you are using the priaid-Services as part of your Platform Operator’s services. Therefore, priaid cannot answer any privacy requests as we are not able to identify you as the End User, who is owner of the data. Do contact your Platform Operator for this reason.** Please consider that in case that you still contact priaid the request under this paragraph may require to temporarily process your personal information by priaid.

### 1.5. *For which purposes are data generally collected and submitted?*

priaid collects and utilizes data to provide user-oriented and appropriate Services (i.e. priaid-Services) and to improve them. Additionally, the data is utilised to provide products or services requested by you. The data entered by the user will be used by the API Operator for the following purposes:

- Provision of the priaid-Services, e.g.:

- Online analysis, which can help to analyse the End User's symptoms and provide information about possible conditions that could correlate with the entered symptoms.
- Selection of suitable medical specializations.
- priaid can submit data to service providers supporting priaid's operations (e.g. hosting, technical support, etc.). We assure that these service providers will adhere to at least the same level of data protection as the API Operator itself.
- priaid can submit data if it is required by law, court orders or other rules and regulations.

The Platform Operator and customer of priaid warrants that all personal data will be treated confidentially. The transfer of anonymized (health) data to priaid and third parties is permitted, because the data cannot be related to individuals due to the anonymization.

priaid further took all suitable technical and organizational measures to protect data against unauthorized processing and knowledge by third parties

The Platform Operator can submit personal health data only to third parties when the user explicitly agrees and has been informed about this step.

If personal data will be submitted to third parties to provide services requested by you, the Platform Operator ensures that the personal data will be processed according to applicable law, as well as their privacy statement (privacy policy).

Please consult the terms and conditions (terms of use) and/or privacy statement (privacy policy) of the Platform Operator how the collection, storage, processing and transport of this data is regulated for the services of the Platform Operator. This is under no influence of priaid and not regulated by priaid.

By using the Platform Operator's specific services which depend on the priaid-Services, you agree that priaid processes data collected from you as described above for the purpose mentioned before. Analysis and evaluation of such data enables us to provide and improve our priaid-Services.

**I agree to the usage of my data as described above for the purpose mentioned before.**

## **2. Transfer and Security**

### *2.1. What are the security measurements applied to protect personal data?*

priaid adopts suitable safety measures to prevent data loss, misuse or alteration of information and data. priaid further took all suitable technical and organisational measures to protect data against unauthorised processing and knowledge by third parties. priaid will store non-identifiable user data during the usage of priaid-Services and after that as long as necessary to provide and improve the priaid-Services.

### *2.2. Are email communications secure?*

When you communicate with priaid via email, the data transfer is not encrypted. This also applies when priaid sends you a reply via email. In those cases, confidentiality is not warranted. Emails – generally fast, reliable and inexpensive – are transmitted through several processors. Therefore, there are numerous possibilities to save, analyse or to alter message. Unencrypted emails are not appropriate to send confidential information to priaid.

## **3. Access to personal health data**

### *3.1. Who has access to your personal health data?*

Nobody can access the user's personal health data without their explicit approval. If you agree with it by consent your Platform Operator may forward your personal health data to Healthcare providers ("Healthcare Provider Customer"). priaid does not collect or store any personal data while you are using the priaid-Services as part of your Platform Operator's services. Therefore, neither employees of priaid nor third parties can process personal health data if the user does not provide personal data (person-identifying information) in the fields, which are foreseen for the transfer of health data, e.g. information about allergies (see also paragraph 1.3.).

### *3.2. Which health data will be transferred to third parties, and to which purpose?*

The Platform Operator does not transfer personal information to priaid or third parties without explicit authorisation by the user.

If personal data will be submitted to third parties to provide services requested by you, the Platform Operator ensures that the personal data will be processed according to applicable law, as well as their privacy statement (privacy policy).

Your Platform Operator may ask for personal information on different occasions, e.g. when you are using additional products or services (e.g. booking of an appointment or usage of the appointment-module by the user, requests for consultations with a doctor or healthcare provider or medical request), which requires data-transfer to a third party (for example to the respective doctor) when the user gives the declaration of consent. The collection, storage, processing and transport to a third party is under no influence of priaid and not regulated by priaid. For this reason, consult the terms and conditions (terms of use) and/or privacy statement (privacy policy) of the Platform Operator.

## 4. User rights and others

Every user has the following rights by law:

- Right to information
- Right to blocking of data transfer
- Right to rectification
- Right to deletion of personal data and information

The user has the right to request information from the Platform Operator or priaid at any time regarding the user data that are collected and processed by the Platform Operator or priaid. The user can further demand at any time access to, rectification and/or deletion of their data. Additionally, the user can at any time revoke their consent to the processing of data. In this case the user cannot use the products or services incl. priaid-Services anymore.

**However please consider that priaid does not collect or store any personal data while you are using the priaid-Services as part of your Platform Operator's services. Therefore, priaid cannot answer any privacy requests as we are not able to identify you as the End User, who is owner of the data.**

**Please submit your privacy requests to your Platform Operator.**

The user has to assert their right in writing to

priaid AG  
Sonnenbergstrasse 17  
8835 Feusisberg  
Switzerland

For the purpose of clear identification, please add a copy of your identity card or your passport.

According to the data protection laws applicable in Switzerland and Europe and other statutory requirements, our users have the right to free-of-charge information about their saved data, as well as the right to rectification, blocking or deletion, if applicable. However, priaid AG reserves the right to charge an appropriate contribution to the processing costs incurred, if (1) the requested information has been provided to the applicant within 12 months preceding the request, and if no legitimate interest in a new provision of information could be detected; if (2) the provision of information entails an exceptionally large amount of work. The contribution can be a maximum of 300 Swiss Francs.

We take the protection of your data very serious. To ensure that personal data are not disclosed to third parties, please send your request per email or per mail including a clear identification of your identity to

priaid AG  
Sonnenbergstrasse 17  
8835 Feusisberg  
Switzerland  
[privacy@priaid.ch](mailto:privacy@priaid.ch)

## 5. Contact

If you have any questions regarding the Privacy Policy or priaid AG's (inc.) data processing policy, please contact [privacy@priaid.ch](mailto:privacy@priaid.ch).

This Privacy Policy was last updated on May, 4, 2018.