

Privacy Policy - Coronavirus Outbreak Control

Your privacy is important to us. It is Coronavirus Outbreak Control's policy to respect your privacy regarding any information we may collect from you via our apps, CovidApp - Covid Community Alert and CoviDoc - Covid Community Alert, and their associated services.

1. Information we collect

Log data

When you access our servers via Covid Community Alert, we may automatically log the standard usage data provided by your device. This data may include your device type and version, push notifications' tokens, time and date, and other details. In accordance with GDPR, we notify you that we have in place automatic augmented profiling of the data subject, by inferring the position, which is needed to improve the collection of the number of interactions among users.

Additionally, when you encounter certain errors while using the app, we automatically collect data about the error and the circumstances surrounding its occurrence. This data may include technical details about your device, what you were trying to do when the error happened, and other technical information that may have contributed to the problem.

Device data

Our app may also access and collect data via your device's in-built tools, such as:

- Location data
- Camera (only applies for CovidDoc - Covid Community alert)
- Contacts
- Mobile number (only applies for CovidDoc - Covid Community alert)
- Notifications
- Background data refresh
- Mobile data
- Language of the device
- Bluetooth information
- Your Covid Community Alert anonymized internal ID
- Covid Community Alert anonymized internal ID of devices detected through Bluetooth LE
- Google or Apple's push notification token
- Bluetooth LE interaction metadata

What we collect can depend on the individual settings of your device and the permissions you grant when you install and use the app.

Personal information

We may ask for personal information, such as your:

- Phone/mobile number (only applies for CovidDoc - Covid Community alert)

Business data

Business data refers to data that accumulates over the normal course of operation on our platform. This may include transaction records, stored files, user profiles, analytics data and other metrics, as well as other types of information, created or generated, as users interact with our services.

2. Legal bases for processing

We will process your personal information lawfully, fairly and in a transparent manner. We collect and process information about you only where we have legal bases for doing so.

These legal bases depend on the services you use and how you use them, meaning we collect and use your information only where:

- it's necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract (for example, when we provide a service you request from us);
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services, and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose (for example, you might consent to us sending you our newsletter); or
- we need to process your data to comply with a legal obligation. In case we modify, even partially, any of these data, it will be considered as part of our processing.

Where you consent to our use of information about you for a specific purpose, you have the right to change your mind at any time (but this will not affect any processing that has already taken place).

We don't keep personal information for longer than is necessary. While we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security. If necessary, we may reserve the right to keep the data we collected for our compliance with a legal obligation or in order to protect your vital interests or the vital interests of another natural person.

3. Collection and use of information

We may collect, hold, use and disclose information for the following purposes and personal information will not be further processed in a manner that is incompatible with these purposes:

- for technical assessment, including to operate and improve our app, associated applications and associated social media platforms;
- to provide you with our app and platform's core features;
- to enable you to access and use our app, associated platforms and associated social media channels;
- to contact and communicate with you;
- for internal record keeping and administrative purposes;
- for analytics, market research and business development, including to operate and improve our app, associated applications and associated social media platforms; and
- to comply with our legal obligations and resolve any disputes that we may have.

4. Disclosure of personal information to third parties

All companies, in part or totally controlled by Coronavirus Outbreak Control Ltd, are not considered as third parties, but as Coronavirus Outbreak Control Ltd.

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, hosting and server providers, ad networks, analytics, error loggers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;
- our employees, contractors and/or related entities;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data.

5. International transfers of personal information

The personal information we collect is stored and processed in Europe, or where we or our partners, affiliates and third-party providers maintain facilities. By providing us with your personal information, you consent to the disclosure to these overseas third parties.

We will ensure that any transfer of personal information from countries in the European Economic Area (EEA) to countries outside the EEA will be protected by appropriate safeguards, for example by using standard data protection clauses approved by the European Commission, or the use of binding corporate rules or other legally accepted means.

Where we transfer personal information from a non-EEA country to another country, you acknowledge that third parties in other jurisdictions may not be subject to similar data protection laws to the ones in our jurisdiction. There are risks if any such third party engages in any act or practice that would contravene the data privacy laws in our jurisdiction and this might mean that you will not be able to seek redress under our jurisdiction's privacy laws.

6. Your rights and controlling your personal information

Choice and consent: By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this privacy policy. If you are under 16 years of age, you must have, and warrant to the extent permitted by law to us, that you have your parent or legal guardian's permission to access and use the app and they (your parents or guardian) have consented to you providing us with your personal information. You do not have to provide personal information to us, however, if you do not, it may affect your use of our app or the products and/or services offered on or through it.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this privacy policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict: You may choose to restrict the collection or use of your personal information. If you ask us to restrict or limit how we process your personal information, we will let you know how the restriction affects your use of our app or products and services.

Access and data portability:

- CovidApp: since we don't collect any personal data, we cannot erase or transfer any of your data, because we are unable to backtrack the information to your profile.
- CoviDoc: you may request details of the personal information that we hold about you. You may request a copy of the personal information we hold about you. Where possible, we will provide this information in CSV format or other easily readable machine format. You may request that we erase the personal information we hold about you at any time.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Notification of data breaches: We will comply with laws applicable to us in respect of any data breach.

Complaints: If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

Unsubscribe: To opt-out of communications, please uninstall the app, switch off the Bluetooth, or remove the notification permissions on your phone.

7. Business transfers

If we or our assets are acquired, merged, corporate liquidation, dissolution (total or partial), change of control, or in the unlikely event that we go out of business or enter bankruptcy, we would include data among the assets transferred to any parties who acquire us. You acknowledge that such transfers may occur, and that any parties who acquire us may continue to use your personal information according to this policy.

8. Limits of our policy

Our app may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

9. Changes to this policy

At our discretion, we may change our privacy policy to reflect current acceptable practices. We will take reasonable steps to let users know about changes via our app or app delivery service. Your continued use of our app after any changes to this policy will be regarded as acceptance of our practices around privacy and personal information.

If we make a significant change to this privacy policy, for example changing a lawful basis on which we process your personal information, we will ask you to re-consent to the amended privacy policy.

Coronavirus Outbreak Control Data Controller and Data Protection Officer

Luca Mastrostefano

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This policy is effective as of 24 March 2020.