

# UmutiSafe Privacy Policy & End-User License Agreement (EULA)

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UmutiSafe is a digital system designed to help users classify leftover or expired medicines and receive safe disposal guidance aligned with Standard guidelines. This document outlines the Privacy Policy and End-User License Agreement (EULA) governing the use of the UmutiSafe platform.

## Introduction

This Privacy Policy and End-User License Agreement explains how UmutiSafe collects, processes, and protects user data, and outlines the rights and responsibilities of both the user and the system provider. By accessing or using UmutiSafe, you agree to the terms described in this document.

UmutiSafe is committed to upholding:

- **Rwanda Data Protection and Privacy Law (2021)**
- **Rwanda FDA Guidelines on Disposal of Unfit Pharmaceutical Products (2021)**
- **ALU Research Ethics Framework (Integrity, Respect, Responsibility)**
- **International ethical standards** including the IEEE and ACM Codes of Ethics

# Privacy Policy

## 2.1 Data We Collect

UmutiSafe collects only the minimum data required for the system to function effectively. This includes:

- **OCR-extracted text** (e.g., medicine name, expiry date, dosage)
- **Non-personal system interaction logs**, such as timestamps and anonymized session IDs
- **Optional user feedback** on system performance
- **Contact information and approximate location** (only with explicit consent) when the user requests assistance from a **Community Health Worker (CHW)** for medicine pickup or supervised disposal

UmutiSafe does **not** collect:

- National ID numbers
- Detailed home addresses without consent
- Prescription details linked to a person
- Any personally identifiable information (PII) unless explicitly consented

**Note:** Contact information shared for CHW pickup requests is processed only with explicit consent and used solely for coordinating safe disposal.

## 2.2 How Data Is Used

Data is used strictly for:

- Performing OCR text extraction
- Running the XGBoost classification model
- Displaying disposal guidance aligned with Rwanda FDA standards
- Improving model accuracy (only with user consent)
- Ensuring system reliability and security

## 2.3 Temporary Processing and Storage

- Uploaded images are processed **temporarily** and automatically deleted after classification.
- OCR-extracted text is held only for the duration of the session.
- Analytics logs are stored in anonymized format.

## 2.4 Data Security Measures

UmutiSafe employs:

- HTTPS encryption
- Secure backend infrastructure
- Access-controlled databases
- Strict data minimization principles

## 2.5 User Rights

Under Rwanda Data Protection Law, users have the right to:

- Know what personal data is collected
- Request deletion of any previously submitted information
- Opt out of optional analytics
- Withdraw consent at any time

## 2.6 Sharing of Data

UmutiSafe does **not** share user data with:

- Third-party advertisers
- External companies
- Unaffiliated institutions

Data may be shared only when legally required by regulatory bodies (e.g., Rwanda FDA) **and only in anonymized format**.

## 2.7 Children's Privacy

UmutiSafe is **not intended for minors**. No data from individuals under 18 is knowingly collected.

# End-User License Agreement (EULA)

## 3.1 Grant of License

UmutiSafe grants the user a limited, non-exclusive, non-transferable license to access and use the platform strictly for personal, non-commercial purposes.

## 3.2 Acceptable Use

Users agree **not** to:

- Reverse-engineer, copy, or distribute the system's code
- Misuse the platform for medical diagnosis or treatment
- Upload images unrelated to medicine classification
- Attempt to bypass the disposal rules or manipulate outputs

## 3.3 Accuracy and Safety Disclaimer

- UmutiSafe provides **guidance**, not professional medical advice.
- Disposal recommendations are based on Rwanda FDA guidelines but may not replace advice from trained professionals.
- Users are encouraged to contact a **Community Health Worker (CHW)** when:
  - Safe disposal at home is not feasible
  - They need supervised pickup or take-back support
  - They prefer confirmation of safe disposal options
  - They have detailed information about their unused/expired medicines and want expert guidance
  - The OCR or classification confidence is low
  - The medicine is regulated, controlled, or unclear

## 3.4 Liability Limitations

UmutiSafe is not responsible for:

- Providing physical disposal tools, PPE, safety boxes, or incineration containers
- Transporting medicines or providing logistics for take-back services
- Health complications arising from user misunderstanding of guidance
- Environmental harm caused by improper disposal outside recommended procedures
- Any disposal actions performed independently without CHW supervision when needed

## 3.5 Intellectual Property

All components of UmutiSafe—including the interface, algorithms, and disposal rule engine—are the intellectual property of the developer. Users may not reproduce or repurpose them without permission.

## 3.6 Termination of Access

UmutiSafe may suspend or terminate user access if:

- Terms of this EULA are violated
- The system is misused or exploited
- Harmful activity is detected

## 3.7 Updates to the Policy

UmutiSafe may update this Privacy Policy and EULA periodically. Users will be notified within the platform when major updates occur.

# Contact Information

For questions about this Privacy Policy or EULA, contact:

**UmutiSafe Team**

Email: [Jules Gatete](#)

# Rwanda FDA Regulatory Alignment (Clause References)

UmutiSafe aligns with the **Rwanda Food and Drugs Authority's Guidelines on Recall, Treatment and Disposal of Unfit Pharmaceutical Products (2021)**. Key clauses integrated into the system's disposal logic include:

## 5.1 Prohibition of Unsanctioned Disposal

According to **Section 4.1(a)**, disposal of any unfit pharmaceutical product **without permission and supervision from the Authority is prohibited**. UmutiSafe therefore guides users to seek CHW support when disposal requires supervised handling.

## 5.2 CHW / Authorized Personnel Involvement

Per **Section 4.3(a–b)**, unfit products must be quarantined, labelled, and handled only by authorized personnel. CHWs fall under community-level authorized handlers, and UmutiSafe integrates them as the correct pathway for supervised pickup.

## 5.3 Prohibited Disposal Methods

The system explicitly avoids recommending any methods prohibited by Rwanda FDA, including:

- Flushing medicines into sewer (**Section 4.2 – liquids & ampoules**) except specific diluted cases under supervision.
- Burning plastics or glass containers (**Section 4.2 – PVC & glass restrictions**).
- Disposal of antineoplastics in sewer or uncontrolled landfill (**Section 4.2**).

## 5.4 Safe Disposal Requirements

UmutiSafe incorporates guidance from **Section 4.5**, ensuring users are aware that supervised disposal requires:

- Requesting authorized disposal through CHW or health facility
- Submitting unfit medicines to appropriate handlers
- Avoiding all disposal without approval

## 5.5 Community-Level Compliance

UmutiSafe supports the public-facing expectations outlined in the guidelines by ensuring medicines do not re-enter the supply chain and are safely transferred to CHWs for consolidation, consistent with **Section 4.4**.

# Data Protection Impact Assessment (DPIA)

To comply with the **Rwanda Data Protection and Privacy Law (2021)**, UmutiSafe conducted a DPIA for all data processing activities.

## 6.1 Purpose of Processing

- To assist users in identifying expired/unused medicines and guide safe disposal.
- To facilitate CHW pickup requests with explicit user consent.

## 6.2 Data Flow Summary

- User inputs → Text/OCR text extraction → XGBoost classification → Disposal guidance → (optional) CHW request with consent.

## 6.3 Risks Identified

- Accidental capture of sensitive data in images or text.
- Misclassification leading to improper disposal.
- Unauthorized access during transmission.

## 6.4 Mitigation Measures

- Immediate deletion of processed images.
- No long-term storage of OCR output or identifiable data.
- Encryption (HTTPS) and access-controlled backend.
- Warnings and CHW referral where confidence is low.

## 6.5 Residual Risk

Residual risk remains **low**, given strong minimization practices and temporary processing.

# **CHW Agreement Policy (Responsibilities & Data Handling)**

This section outlines the expectations, responsibilities, and data-handling requirements for Community Health Workers (CHWs) who support users through UmutiSafe's supervised disposal workflow.

## **7.1 Purpose of CHW Involvement**

CHWs are integrated into UmutiSafe strictly to:

- Assist households that cannot safely dispose of medicines at home
- Provide supervised pickup or take-back services
- Ensure compliance with Rwanda FDA disposal regulations
- Offer community-level support without storing or misusing user data

## **7.2 Data Handling Responsibilities**

CHWs agree to:

- Use user-provided contact details **only** for coordinating pickup/disposal
- Not store personal contact information beyond the disposal process
- Not share user data with third parties
- Follow Rwanda Data Protection and Privacy Law (2021)
- Report any data breach or accidental disclosure immediately

## **7.3 Professional Conduct Requirements**

CHWs must:

- Verify medicine types before transportation
- Ensure safe temporary storage during pickup

- Follow FDA-approved disposal steps
- Avoid any unsanctioned disposal actions
- Maintain neutrality, respect, and confidentiality

## 7.4 Prohibited Actions

CHWs may **not**:

- Collect medicines for resale, redistribution, or personal use
- Store user data in unauthorized logs or devices
- Pressure or coerce users into giving additional information
- Conduct disposal methods not permitted by FDA guidelines

## 7.5 Compliance Confirmation

By participating in UmutiSafe operations, CHWs acknowledge these responsibilities and agree to maintain ethical, legal, and professional standards.

# Consent

By using UmutiSafe, you acknowledge that you have read, understood, and agreed to the terms outlined in this Privacy Policy and End-User License Agreement.