

Summary Privacy Statement

We care about your privacy. If you would like to know if we mean it, but find a Privacy Statement a tad tedious on account of it containing too much legalese, we have produced this brief summary, which provides you with the necessary information and will inform you about the way we process your Personal Data, presented in a nutshell.

What there is to know:

First of all, you will always remain the sole owner of your Personal Data.

UGent acts as the **controller** of your Personal Data in this App: they ensure that your Personal Data and Privacy remain protected.

What data do we collect about you?

- From the moment you give your **consent** by accepting the Privacy Statement and the Terms of Use, we collect **Location Data**, such as GPS Data, Subjective Health Data, such as how you feel, and **User Data**, which are the data about the actions you perform as a user within the App, such as opening and closing the App.
- From the moment you **download the App**, we obtain a lot of **Functional Data** including your device type, language settings, the store where you downloaded the App, its version name and bundle, the time you first opened the App and the duration of use of the App.

Why do we collect these data?

- To identify potentially infected and non-infected clusters (group of people), hotspots and super spreading (exposure to many Users) in order to contain the virus.

Who has access to your Personal Data?

- **Your Personal Data are never sold** or made available to other parties. You will always remain the sole owner.
- If this is necessary for the App to function, access is permitted for **analysts**.
- **Developers** of In The Pocket only have access to **test data**.
- The **cloud provider** processes your Personal Data but has **no access** to them either.
- Only the **aggregated results** of this App can be made available to the **relevant policy advisors, experts and researchers**.
- **Third parties will not have access to your Personal Data**, nor will these be shared with them.

What is in your control?

- You can ask us to access, correct or delete your Personal Data at any time. Please send us an email to coveredapp@ugent.be.
- More information can be found in Article 6 of the full Privacy Statement.

What do we do to protect your Personal Data?

- We have integrated a variety of security measures into the App on a technical and organisational level.
- All of your Personal Data in the App are encrypted locally on your device and to the Google Cloud when you exchange your device.
- Since your Personal Data are only linked to your unique coveredID, your Personal Data are pseudonymised.
- Moreover, your Personal Data are stored encrypted and backed up on a regular basis.
- Your Personal Data will not be stored for more than 6 weeks (from the time of collection).

If you would like to know more, please read our complete Privacy Statement, which explains everything in detail.

Privacy Statement

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General

Ghent University (hereinafter referred to as "**UGent**"), with registered office at St. Pietersnieuwstraat 33, 9000 Ghent, has developed the COVeredApp application (hereinafter referred to as "**App**") and is responsible for processing your Personal Data, which will only be processed if you, as a user (hereinafter referred to as "**User**"), have given your explicit permission for this in the App.

UGent processes your Personal Data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of Personal Data and on the free movement of such Personal Data and repealing Directive 95/46/EC (the General Data Protection Regulation (AVG)) and the Belgian Act of 30 July 2018 on the protection of individuals with regard to the processing of Personal Data. We guarantee that your privacy will be respected and the exact way in which we will go about this is specified below.

Personal Data from the App will only be stored with a view to (1) identifying the User's own risk contacts and cataloguing Subjective Health Data, (2) generating accurate and up-to-date Personal Data for scientifically-informed policy choices and scientific research in times of crisis and (3) alleviating healthcare concerns.

In the unlikely event that incidental findings are made, these will be communicated to the User in a confidential manner via push notifications.

1. What Data do we collect?

We collect and process the following Personal Data from you as a User:

	Personal Data	Details	Context of this processing
Category 1	Location Data	GPS data	These Location Data will be processed from the time you give your consent until (i) the time you withdraw your consent, (ii) you delete the App or (iii) at the end of a 6-week period upon collection.
Category 2	User Data	Data about the actions you perform as a User with the App, such as: opening and closing the App. The App registers how often and at what times you perform these actions.	These User Data will be collected from the time you agree to the Terms of Use and this Privacy Statement in the App. This will be done until (i) you withdraw this consent, (ii) you remove the App or (iii) at the end of a 6-week period (from the time of collection).
Category 3	Subjective Health Data	Data about your how you feel (tired, feverish, sick, healthy, ...)	These data will be entered by the User, being yourself, on your own initiative. It is very important to know that you are not obliged to do so. However, you give your explicit consent to us to process these data from the moment you enter them voluntarily.

Category 4	Functional Data	Your type of device, the language setting of your device's operating system (e.g. Be-NL or Be-Fr), the store in which you downloaded and installed the App, together with its version name (Android) and bundle (iOS), the time (in milliseconds) when you first opened the App and the duration of use of the App, rounded up to the next hour, the country where you are staying and the proximity of other Users of the App (via Location Data).	These Functional Data are collected from the moment you download the App. This will be done until you delete the App or at the end of 6 weeks (from the time of collection).
Category 5	Cookies	Functional and behavioural cookies will be used to determine whether you are experiencing problems using the App, possibly due to a bug.	The App also uses functional and behavioural cookies. The latter are only used to support you when using the App in case there is a bug in the App. We will only use the behavioural cookies if you have given your explicit permission to do so in the cookie banner.

The App does NOT keep TRACK of your usage and, therefore, does NOT know:

- the internet addresses, browser activity or URLs you visit
- the content of messages, e-mails, calendar, notifications or other content (except notifications sent by the app itself)
- images, photos, videos, or sound recordings.

2. For what purpose?

The purpose of the App is to identify potentially infected and non-infected clusters (group of people), hotspots and super spreading (exposure to many Users) in order to contain the virus.

In order to achieve this, the App requires the Users' Personal Data listed above. These Location Data, User Data, Subjective Health Data and Cookies will only be processed subject to the Users' **express consent**. This consent is given by the User agreeing to this Privacy

Statement. With regard to Subjective Health Data, this consent is given once again when the User enters the data into the App.

The Functional Data are processed in the context of UGent's **legitimate interest**.

Under no circumstances and at no time will your Personal Data be used or linked to other data for individual monitoring or enforcement purposes.

3. How are your Personal Data collected and processed in the context of the App?

Through your use of the App, Location Data, User Data, Functional Personal Data and Cookies are collected. The App creates a unique coveredID for your device, allowing us to recognise your device as a User. Your Personal Data are only linked to this coveredID, so no other Personal Data, including your name, date of birth, address or age, are required from you. Consequently, your Personal Data can only be linked to your device, not to your name.

It is the User who enters Subjective Health Information into the App.

Your Personal Data are collected in the App, encrypted and sent to the secure Google Cloud Platform. Your Data will also be stored on the secured Google Cloud Platform in an encrypted format. Due to the encryption used, your Personal Data will not be readable by Google.

Your Personal Data will be consulted and processed by the analysts involved in order to gain insights that are in keeping with the very purpose of the App.

The way in which your Personal Data are secured and exactly which persons have access to them, is clearly specified further down in this privacy statement. (See "*Who will have access to your personal data*" and "*Technical and organisational measures and retention period*").

4. Who will have access to your Personal Data?

The people listed below will not have access unless this is necessary for the operation of the App (i.e. on a strictly need-to-know basis). Access only applies for the purposes stated in this Privacy Statement.

- *UGent analysts*: have access to your Personal Data. These analysts at UGent need access to the data in order to analyse and, therefore, achieve the objectives of the App. These UGent analysts are bound by the Generic Code of Conduct for the Processing of Personal Data and Confidential Information within UGent.
- *Developers of In The Pocket*: have no access to your Personal Data. They only have access to test data (dummy data or developed without Personal Data).
- *Cloud provider*: Google Cloud for the storage of your Personal Data. Google acts as controller of your Personal Data, but has no access to your Personal Data. By means of a specific agreement, we guarantee that they will also respect your privacy.

- *Relevant policy advisors, experts and the government:* they do not have access to your Personal Data. However, the App's aggregated and pseudonymised results, such as graphs and trends, will be shared with them in line with the App's objectives.
- *Scientific research:* the data from the App will be made available for scientific research in a pseudonymised and aggregated format. Access for scientific research is always via UGent's analysts and is only granted for purposes that are in keeping with those of the App and therefore do not fall outside the User's expectation pattern. Under no circumstances will access be granted to the entire dataset collected in the App.

Your Personal Data will *not be shared* with, or made accessible to, third parties.

5. Technical and organisational measures and retention period

UGent, In the Pocket and the analysts involved have incorporated appropriate technical and organisational measures into the App to secure your Personal Data and protect your privacy.

All of your Personal Data in the App will be encrypted locally on your device and during the exchange from your device to the Google Cloud. Moreover, your Personal Data are only linked to your unique coveredID, so your Personal Data are pseudonymised.

In addition, your Personal Data are encrypted, stored and regularly backed up.

Your Personal Data will be stored and retained for a **6-week period** from the first moment of collection. After this period, your Personal Data will be made anonymous and will therefore be removed, as we, on the basis of anonymous data, are no longer able to determine to whom these data belong.

6. Your rights

Right of access and inspection: Free of charge at any time, you are entitled to inspect your Personal Data, as well as the use UGent makes of your Personal Data.

Right of correction, deletion and limitation: You are entitled to request us to correct, supplement or delete your Personal Data at any time. You acknowledge that in the event of refusal of notification or request for removal of Personal Data, certain services and products will become unavailable. You may also request that we limit the processing of your Personal Data.

Your use of the App is voluntary and without obligation. You have the right to discontinue your cooperation at any time, without having to give a reason for doing so. This can be done by simply deleting the App.

Right of Objection: You are also entitled to object to your Personal Data being processed for serious and legitimate reasons. In addition, you are always entitled to object to the use of Personal Data for direct marketing purposes; in those cases, you do not have to give reasons.

Right of free data transfer: You have the right to obtain your Personal Data processed by us in a structured, regular and machine-readable form and/or to transfer it to other authorities.

Right of withdrawal of consent: Insofar as your data are processed subject to your prior consent, you have the right to withdraw such consent.

Exercise of your rights: You can exercise your rights by contacting us either by e-mail on coveredapp@ugent.be or by post to Universiteit Gent, St. Pietersnieuwstraat 33, 9000 Ghent. Please enclose a copy of your identity card.

Automatic decisions and profiling: The processing of your Personal Data does not include profiling, nor will we subject you to automated decisions.

Right to lodge a complaint: You are entitled to lodge your complaint to the Belgian Data Protection Authority: Belgische Gegevensbeschermingsautoriteit, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, e-mail: contact@apd-gba.be. This does not affect your right to recourse to a civil court. If you were to suffer damage as a result of your Personal Data having been processed, you can file a claim for damages.

You can exercise your rights by sending a simple request by e-mail to coveredapp@ugent.be. We will try to process your request within seven days. This excludes Personal Data collected by the physician during diagnosis, which are not stored or processed in the App.

In order to exercise your rights, we use your coveredID, which is the only way we can identify your device. When the App is deleted, your Personal Data and coveredID are automatically deleted as well, so it is no longer possible to exercise the above rights.

7. Contact

You can always contact us with any questions or remarks you may have via coveredapp@ugent.be. For any questions about the various privacy-related rights and obligations, or if you believe that your Personal Data are being processed unduly and/or incorrectly by UGent, please contact the UGent Data Protection Officer via privacy@ugent.be.

Finally, you can contact the confidential advisors for psychosocial support at trustpunt@ugent.be.

This Privacy Statement may be amended to comply with applicable law and to ensure that it is consistent with the App. If this Statement is amended, it will be notified via the App and the amended Statement will be made available.

8. Governing Law and Jurisdiction

This Privacy Statement shall be governed, construed and implemented in accordance with Belgian legislation that applies exclusively.

The courts of East Flanders, Ghent Department, are exclusively competent to take cognizance of any dispute that may arise from the interpretation or implementation of this Privacy Statement.