

## GDPR Data Processing Record

Last updated: March 21, 2019

This document provides information regarding the personal data processing performed by the yourlifeyourdata.com website and the associated Lydia app in compliance with GDPR Article 30. Yourlifeyourdata.com and the associated Lydia app (available through the Apple and Android App stores) together are a free direct-to-consumer solution that allows individuals to store, track, and share their health data.

### 1.

- (a) the name and contact details of the Company, in its role as Controller, The controller's representative and the Controller's Data Protection Officer;

Primary processor and controller:

iNetXperts Corp d/b/a Get Real Health  
51 Monroe St. Suite 1700  
Rockville, MD 20850  
USA  
+1 301-309-0058  
Support@yourlifeyourdata.com  
Data Protection Officer: Jason Harmon, CTO

Additional Processor:

Microsoft Azure  
Microsoft Privacy, Microsoft Corporation  
One Microsoft Way, Redmond, Washington 98052,  
USA  
+1 (425) 882 8080

The EU resident representative:

Bluedog CSL  
12 Eastwood  
Finglas  
Dublin, D11 YY6X  
Republic of Ireland  
+353-083-043-0968  
[termini@bluedog.ie](mailto:termini@bluedog.ie)  
Contact person: Tom Termini, Managing Director

(b) the purposes of the Processing;

- To allow individuals to
  - Enter, import, view, and export their health data;
  - share and unshare their health data with other individuals; and
  - name other users as “custodians” of their health data who are authorized to share and unshare the original user’s health data.
- As necessary to allow technical support persons to provide technical support

(c) a description of the categories of Data Subjects and of the categories of Personal Data;

The Data Subjects are individual end-users who choose to store their data in the system. The categories of personal data are as follows:

- Personally identifiable information;
- personal health data; and
- any other data the end user might enter into free-text fields.

(d) the categories of recipients to whom the Personal Data have been or will be disclosed, including recipients in Third Countries or International Organisations;

Only to specifically authorized employees and contractors of Get Real Health and only as necessary to provide technical support.

(e) transfers of Personal Data to a Third Country or an International Organisation, including the identification of that Third Country or International Organisation and, in the case of transfers referred to in the second subparagraph of Article 49(1) of the GDPR, the documentation of suitable safeguards;

e-mail addresses only may be transferred to a third country for e-mail communication with individual end users as authorized by the terms of use and privacy policy of the system.

- (f) where possible, the envisaged time limits for erasure of the different categories of data; and

Less than 7 days from written notification by a specific end user that they wish to have their data erased.

- (g) where possible, a general description of the technical and organisational security measures referred to in Article 32(1) of the GDPR.

The technical environment is configured, operated, maintained, and monitored under a strict set of security policies and procedures based on the HITRUST Common Security Framework standard.

- 2. Each processor and, where applicable, the processor's representative shall maintain a record of all categories of processing activities carried out on behalf of a controller, containing:
  - 2.1. the name and contact details of the processor or processors and of each controller on behalf of which the processor is acting, and, where applicable, of the controller's or the processor's representative, and the data protection officer;

Processor and controller:

iNetXperts Corp d/b/a Get Real Health  
51 Monroe St. Suite 1700  
Rockville, MD 20850  
USA  
+1 301-309-0058  
Support@yourlifeyourdata.com  
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Republic of Ireland  
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[termini@bluedog.ie](mailto:termini@bluedog.ie)  
Contact person: Tom Termini, Managing Director

**2.2.** the categories of processing carried out on behalf of each controller;

None beyond those described above.

**2.3.** where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfers referred to in the second subparagraph of Article 49(1), the documentation of suitable safeguards;

e-mail addresses may only be transferred to a third country for e-mail communication with individual end users as authorized by the Lydia app terms of use and privacy policy.

**2.4.** where possible, a general description of the technical and organisational security measures referred to in Article 32(1).

See response to item 1(g) above.