

# Privacy Policy

## Vascular1

### Ultrasound Guided Vascular Access Training Module

**Effective date:** February 1, 2021

Researchers from Stanford University and VA Palo Alto Healthcare System have developed a virtual reality vascular ultrasound training module. This module is designed for users over 18 years of age. We respect your privacy. This privacy policy describes our collection of personal data when you participate in a Vascular1 module or study, our use and disclosure of such personal data, and the steps we take to protect such personal data. “Personal data” means any information relating to an identified or identifiable natural person directly or indirectly. Your use of the Vascular1 App and your participation in any study are each voluntary. By participating in the Study, you consent to the privacy practices described in this privacy policy. The entity responsible for the collection and processing of your personal data in the context of the Study via the Vascular1 App is Dr. Oliver Aalami. (650) 852-3451. 3801 Miranda Avenue (112), Palo Alto, CA 94304-1290.

#### Registering for the Study through Vascular1

In order to participate a Vascular1 Study, you must affirmatively consent to participate in the Study. This will be provided by a study coordinator and be on paper. We will inform you of the purposes for which we are collecting, processing, using, and sharing your personal data and we will obtain your consent through an informed consent document and process. To provide your informed consent, you will be asked to provide your first and last names, as well as your signature. The Vascular1 training module requires users to create an “alias” and to record their level of training to be identified by. No names or other identifiable information will be captured.

#### Information We Collect

In addition to the data we collect in registration for the Study (an alias & your training level), we collect the following data through the Vascular1 App:

**Data Imports.** The Vascular1 App monitors your movements during the training module and uses these movements to make recommendations to improve your technique, if necessary.

#### How We Use Information

We use your alias to create an anonymous “user” ID for you to be able to return to the module and continue to train where you left off and compare your results and measure improvement. Your level of training will be used to be able to stratify your performance with others in a similar cohort. We do not use cookies, beacons or device fingerprinting.

#### How We Disclose Information

Except as described in this privacy policy, we will not sell, rent, lease, give away, disclose or share your contact information, and will not disclose your information that we collect through the Vascular1 App and the Study to third parties without your consent. We may

provide contact or coded study information to third parties if you consent to us doing so, as well as in the following circumstances:

When we work with third parties who provide services on our behalf, we take steps to limit the personal data provided to them to that which is reasonably necessary for them to perform their functions for the allowable purposes listed above. We require them by contract to agree to only process the personal data in accordance with our instructions and to maintain the security and confidentiality of such information by applying adequate technical and organizational measures. \*We do not collect identifiable information\*

To the extent permitted by applicable law, we may disclose your information if required to do so by law to comply with state and federal laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies. \*We do not collect identifiable information\*

We also reserve the right to disclose your information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Vascular1 App and the Study and any facilities or equipment used to make the Vascular1 App or Study available, or (v) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others. We will notify you of any such disclosures. \*We do not collect identifiable information\*

Information about our users, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, to the extent and in the way as prescribed by applicable law. \*We do not collect identifiable information\*

As described above in the “How We Use Information” section, we will combine your Study data with those of other Study participants. The combined Study data will be transferred to Vascular1 Portal, a computational research platform, for analysis. Researchers from the Study team and its partners accessing data through Vascular1 Portal will analyze the data and report findings back through blog or scientific publications. This Study gives you the option to share your coded Study data more broadly, with other researchers worldwide, for use in this research and beyond to benefit future scientific research. If you choose to share your data broadly, your coded metadata (responses to survey questions and activity data) will be added to a shared dataset available to qualified researchers on the Vascular1 Portal ([www.Vascular1.ai](http://www.Vascular1.ai)), and will be made available to qualified researchers who are registered Vascular1 users and who agree to using the data in an ethical manner, to do no harm and not attempt to re-identify or re-contact you unless you have chosen to allow them to do so. We will require proof of ethics approval for the intended use. The study team will have no oversight on the future research that qualified researchers who have secured ethics approval may conduct with the coded study data.

## **Do Not Track**

We do not track the Vascular1 App visitors over time and across third party websites or online services to provide targeted advertising, and we do not specifically respond to Do Not Track (“DNT”) signals.

## **Data Security**

Vascular1 Server uses appropriate physical, managerial, and technical safeguards that are designed to protect the confidentiality, integrity and security of personal data that we

collect and maintain against accidental or unlawful loss, theft and misuse and unauthorized access, disclosure, alteration destruction, or any other type of unlawful processing. We cannot, however, fully guarantee the security of personal data or other information transmitted to us through the Vascular1 App or the Study. This is low risk as we do not collect identifiable data.

## **Your Rights and Choices**

Subject to applicable law, you may have certain rights regarding the data we maintain about you. You may have the right to request access to and receive information about the data we maintain about you, or have your data rectified, blocked or deleted if it is incorrect, inaccurate or outdated. Following your request, we will accommodate your enquiry as required by applicable law. If you wish to access, rectify, delete or block any data we hold about you, you may contact the Study team at [vascussim@gmail.com](mailto:vascussim@gmail.com). Please note that while any changes you make will be reflected in active user databases within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so, as permitted by applicable law. If you would like to withdraw from a Study, you may do so contacting us at the above email or talking to a study coordinator at your site. You can withdraw any consent you have provided to us for the processing of your personal data at any time and free of charge. Please note that if you withdraw from the Study, we will stop collecting new data from you, but the coded study data that you have already provided will already have been distributed and will not be able to be destroyed or deleted. If you have questions about your rights and choices in relation to your personal data, or would like to request additional information, please contact [vascussim@gmail.com](mailto:vascussim@gmail.com).

## **Cross-Border Transfer of Your Information**

We may transfer your data to countries outside of your country of residence which may have different personal data protection laws than the country in which you initially provided the information. In doing so, we comply with applicable legal requirements pertaining to the transfer of data to other countries and will protect that information as described in this Privacy Policy.

Although you may access the Vascular1 App or participate in the Study from a location outside of the United States, any data collected by us in connection with the Vascular1 App or the Study may be transferred to, processed, and stored within the United States. Also, we may transfer your data from the United States to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Vascular1 App and the Study.

By using the Vascular1 App or participating in the Study, you will be asked to consent to the transfer of your data, including your mole photos, to countries outside of your country of residence, including to the United States.

## **Changes to Our Privacy Policy**

We may change this privacy policy from time to time. Any changes will be posted on this page with an updated revision date. In the event that any changes to this privacy policy materially alter your rights or obligations under this privacy policy, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access the Vascular1 App or the Study for the first time after such material changes are made. Your continued use of the Vascular1 App or the Study after the revised privacy policy

has become effective indicates that you have read, understood and agreed to the then-current version of this privacy policy.

## **Contact**

If you have any questions, comments or requests regarding this privacy policy or our processing of your information, please contact:

vascussim@gmail.com

Vascular1 Researchers

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