

EyRIS SELENA+

Privacy Policy

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EyRIS Pte Ltd
60 MacPherson Road
Block 1 Siemens Centre #05-08
Singapore 348615



PRIVACY POLICY

Your privacy is important to us. This Privacy Policy ("**Policy**") describes how EyRIS Pte. Ltd. (UEN: 201805165Z) and its Affiliates ("**EyRIS**", "**we**" or "**us**") collects, uses, stores, discloses or processes your Personal Data through the use 'EyRIS SELENA+' and 'EySCAN' (collectively, the "**EyRIS Platform**"). Please take a moment to read this Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

EyRIS SELENA+ is a cloud based (URL) AI technology that is intended to aid healthcare professionals in screening patients at risk of vision loss through analysis of color retinal images of patients to identify signs of (i) Diabetic Retinopathy; (ii) Glaucoma Suspect; and (iii) Age-related Macular Degeneration. EySCAN is a data management software (including the EySCAN application programming interface) for use with EyRIS SELENA+, and provides the user interface for users to interact with EyRIS SELENA+.

Your use of and access to the EyRIS Platform are subject to this Privacy Policy and our Terms of Use.

"**Personal Data**" refers to any data or information which can be used to identify you or from which you are identifiable. This includes but is not limited to your ethnic group, nationality, telephone number, email address, fundus photographs and/ or images, government issued identification numbers, information relating to health (e.g., health history, previous conditions etc.), and information about your usage of and interaction with EyRIS Platform.

"**Affiliate**" means, in relation to EyRIS Pte. Ltd., any entity that controls, is under the control of, or is under common control with, EyRIS Pte. Ltd., where control means the direct or indirect ownership of more than 50 per cent of the voting capital or similar right of ownership of that party or the legal power to direct or cause the direction of the general management and policies of that party, whether through the ownership of voting capital, by contract or otherwise.

This Privacy Policy does not apply to information retained separately by healthcare professionals in their own systems and/ or databases.

1. Collection of Personal Data

- 1.1 We generally do not collect your Personal Data unless:
 - (i) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your Personal Data to us after:
 - a. you (or your authorised representative) have been notified of the purposes for which the data is collected; and
 - b. you (or your authorised representative) have provided written consent to the collection and usage of your Personal Data for these purposes; or
 - (ii) collection and use of your Personal Data without consent is permitted or required by the Personal Data Protection Act 2012 ("**PDPA**") or other laws.
- 1.2 If you provide Personal Data of a third party to us (e.g., next-of-kin information), you confirm that you are duly authorised by that third party to do so for the purposes for which you have provided that Personal Data to us.
- 1.3 When collecting Personal Data, we may collect it in various ways, including:
 - (i) through other medical and health related service providers;
 - (ii) through the submission of Personal Data via the EyRIS Platform;
 - (iii) through our staff or other representatives;
 - (iv) through emails or other file sharing means that you use to provide the Personal Data to us; and
 - (v) through other users or third parties.
- 1.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with services you have requested, either to the same standard as if you had provided the Personal Data or at all.

2. Purposes for Collection, Use and Disclosure of Personal Data

- 2.1 Generally, EyRIS collects, uses and discloses your Personal Data for the following purposes:
 - (i) providing you with the services and functions of the EyRIS Platform;
 - (ii) responding to feedback, queries, requests, and complaints;
 - (iii) uploading onto computer systems operated or managed by EyRIS and/ or third parties user health records and fundus photographs and/ or images for record keeping purposes;
 - (iv) enforcing our Terms of Use;

- (v) further developing the EyRIS Platform;
- (vi) carrying out research, planning, and statistical analysis and for the purposes of product development;
- (vii) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (viii) complying with any applicable rules, laws and regulations, codes of practice or guideline or assisting in law enforcement and investigations by relevant authorities;
- (ix) fulfilling any other purpose for which you provide us Personal Data; and
- (x) fulfilling any other purpose that we may notify you of from time to time.

3. Disclosure of Personal Data

- 3.1. EyRIS will take reasonable steps to protect your Personal Data against unauthorized disclosure. Your Personal Data may be disclosed, for the purposes listed above where applicable, to third parties who may be overseas or in Singapore, including:
- (i) our subsidiaries, related companies, Affiliates, or partners;
 - (ii) contractors, service providers and other third parties we use to support our business;
 - (iii) professional advisors such as lawyers;
 - (iv) websites, publications or scientific forums or to be used in material for the purposes of publishing research results and outcomes;
 - (v) relevant government regulators, authorities, law enforcement agencies, and/ or such other persons as directed by applicable laws, rules or regulations; and
 - (vi) any other party to whom you authorize us to disclose your Personal Data.

4. Protection of Personal Data

- 4.1. To safeguard your Personal Data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures including up-to-date antivirus protection, MD5 algorithm encryption and SSL technology to secure storage and transmission of Personal Data, and disclosing Personal Data both internally and to third party service providers and agents only on a need-to-know basis.
- 4.2. EyRIS protects the Personal Data it collects in a secure database with important data encrypted, and the database servers are hosted in protected data centers located in Singapore or outside Singapore.
- 4.3. You should be aware, however, that no method of transmission or storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.
- 4.4. It is imperative that you have measures to safeguard against unauthorized access to your password and to your personal devices. Please ensure that you read and understand the Terms of Use.

5. Access to and Correction of Personal Data

- 5.1. If you wish to make a request for access to a copy of the Personal Data which we hold about you or information about the ways in which we use or disclose your Personal Data, or a request to correct or update any of your Personal Data which we hold about you, you may submit your request to our Data Protection Officer via email at customercare@eyris.io. A fee may be charged for an access request. We will respond to your request as soon as reasonably possible.
- 5.2. Should we not be able to respond to your request within [30] days after receiving your request, we will inform you in writing within [30] days of the time by which we will be able to respond to your request.

6. Accuracy of Personal Data

- 6.1. We generally rely on Personal Data provided by you or your authorized representative. In order to ensure that your Personal Data is current, complete and accurate, please update us if there are changes to your Personal Data by informing our Data Protection Officer via email at customercare@eyris.io.

7. Retention of Personal Data

- 7.1. We may retain your Personal Data for as long as it is reasonably necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws, rules or regulations, and thereafter we will cease to retain your Personal Data, or remove the means by which the data can be associated with you.

8. Transfer of Personal Data out of Country

- 8.1. Your Personal Data may be transferred from the country in which you are present while you are using the EyRIS Platform (“**Home Country**”) to another country where our affiliates, business partners, authorized agents, third party service providers or data storage facilities are located. You understand and consent to the transfer of your Personal Data outside of your Home Country. To the extent that we need to transfer your Personal Data outside your Home Country, we will endeavor to do so in accordance with the PDPA to

provide a standard of protection for your Personal Data so transferred that is comparable to that provided under the PDPA.

9. Third Party Sites

- 9.1 The EyRIS Platform may contain links to sites operated by entities other than EyRIS (“**Hyperlinks**”). The Hyperlinks are provided for convenience only. The linked sites are not subject to EyRIS’ control and are governed by their own privacy policies. Once you have left the EyRIS Platform, you should check the applicable terms, conditions and policies of the third-party sites to determine how they will handle any information they collect from you.

10. Withdrawing Consent

- 10.1. The consent that you provide for the collection, use and disclosure of your Personal Data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your Personal Data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer via email at customer@eyris.io.
- 10.2. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and obligations. In general, we shall seek to process your request within [five (5)] business days of receiving it.
- 10.3. We fully respect your decision to withdraw your consent. However, depending on the nature and scope of your request, we may not be able to continue providing our services to you. In such circumstances we shall notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in paragraph 10.1 above.
- 10.4. Please note that withdrawal of consent does not affect our right to continue to collect, use and disclose Personal Data where such collection, use and disclose without consent is permitted or required under applicable laws, rules or regulations.
- 10.5. Your Personal Data may be retained for a reasonable period after your relationship with us has been altered in any way or has ended, for reasonable purposes, such as to resolve any concerns between you and us.

11. Decommissioning

- 11.1. If you choose to discontinue using the EyRIS Platform, any personal data collected will be retained in accordance with regulatory requirements, as outlined in Section 10.5.
- 11.2. If you would like to obtain a copy or backup of your personal data held by us, please follow the instructions provided in Section 5.
- 11.3. If you wish to withdraw your consent for the retention of personal data, please refer to Section 10.

12. Use of Cookies

- 12.1. If you would like to manage, block or delete cookies you should be able to do so through your internet browser. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the EyRIS Platform.
- 12.2. EyRIS uses cookies to recognize your browser or device, and provide you with essential features and services and for additional purposes, including:
- (i) recognizing you when you sign-in to use the services;
 - (ii) conducting research and diagnostics to improve the EyRIS Platform;
 - (iii) preventing fraudulent activity;
 - (iv) improving security; and
 - (v) measuring and analyzing the performance of the EyRIS Platform.
- 12.3. A cookie is a text file that is placed on your hard drive by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.
- 12.4. Third parties (such as analytics software) may also use cookies, over which we have no control. These cookies are likely to be analytical/ performance cookies or targeting cookies.
- 12.5. If you would like to manage, block or delete cookies you should be able to do so through your internet browser. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the EyRIS Platform. By using the EyRIS Platform without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not deleted or rejected on your device.

13. Data Protection Officer

- 13.1. If you have any questions or feedback concerning our personal data protection policies and procedures, or any other matter, our Data Protection Officer can be reached at:

Address: 60 MacPherson Road, Block 1 Siemens Centre #05-08, Singapore 348615

Email: customer care@eyris.io

and/ or such other contact information posted at <http://www.eyris.io>.

14. Effect of Policy and changes to Policy

- 14.1. This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your Personal Data by us.
- 14.2. We reserve the right, at our sole discretion, to change, modify or otherwise alter this Policy at any time, by posting the revised Policy at <http://www.eyris.io>. You may determine if any such revision has taken place by referring to the date on which this Policy was last updated. You hereby waive any right you might have to receive specific notice of such changes. Your continued use of the EyRIS Platform constitutes your acknowledgement and acceptance of such changes, modifications and alterations.

Effective date: [20 July 2023]

Last updated: [20 July 2023]