

PRIVACY NOTICE

Last updated: 29.11.2022

General

Thank you for your interest in this website, Allbionics and the products, services and features we make available to you (collectively the “**Service**”). Protecting user’s data and using it only in the way our visitors/users expect from us is our highest priority. Thus, the following Privacy Notice is designed to inform you about the processing of your personal data and your rights regarding this processing according to applicable data protection laws.

We, Simple Joint Stock Company Allbionics, a legal entity established and operating under the laws of Poland, registration address: 60 Podole Str., Krakow, 30-394, Poland, are the data controller, meaning that we are the organisation that is legally responsible for deciding how and for what purposes the data is used and therefore, are responsible for the data processing explained herein.

Our Service may link to other third-party websites and services to make more features available to you. Such third parties may also collect your personal data based on their own privacy notices. For more information about how they collect and use your information, please read their privacy notices respectively.

We do not provide the Service to subjects under 18 years old (or other applicable age of maturity in your jurisdiction), subsequently we do not process their personal data. We do not intend nor knowingly collect and process personal data of minors. We rely on the personal data we’ve receive from data subjects (including data as to a user’s age and legal capacity). By using or accessing our Service, you acknowledge that you are at least 18 years old (or other applicable age of maturity in your jurisdiction) and have all rights to enter into an agreement with us as to the receipt of Service, as well as you give us the consent to collect and process your personal data for the purposes, we mention in this Privacy Notice.

If you are aware that any personal data of anyone under 18 years old (or other age limitation, depending on the jurisdiction) has been shared with or through our Service, please let us know so that we can delete that data.

Should a person whom we know to be under 18 years old makes known to us his or her personal data, we will use that information only to respond directly to a specific request from such person and will not use it beyond the scope of that request.

Data We Collect

When you use our Service or when you correspond with us by email, phone, through social media or otherwise, we may collect the following personal information about you:

- full name, country of residence and email address;
- date of birth, nationality, residential address;
- gender data;
- matters you give us by phone, email, post or via social media;
- account details, such as username and login details, phone number, uploaded content, etc.;

- your health information, e.g. information about side of the limb difference or damage, cause of the limb damage, date of limb amputation, information about phantom/residual pain, level of limb loss, areas of concern with the residual limb (scarring, wounds, extremely prominent areas, skin grafts, etc.), other health conditions;
- data on the functionality and usage of the limb prosthetics, including firmware revision number, up time, sensor site activation, grip type and number, error codes. This information is used for the purposes of providing software updates, remote troubleshooting, and to improve or enhance our products and services. Data may be analysed individually or in aggregate to observe trends across users or to develop improved control algorithms;
- your responses to requests, surveys and promotions;
- any other information you disclose to us voluntary, e.g. when sending customer feedback through the Service.

You may choose not to provide us with your personal data, but in such a case you may not be able to take advantage of some of our Service's features, or we might not be able to provide the Service to you. If you are uncertain about what information is mandatory, you are welcomed to contact us.

Please note that we collect and process personal data that is, by its nature, particularly sensitive.

This includes data concerning health, as mentioned above. We do so only based on your explicit consent and only for the purposes stated in the Privacy Notice.

Cookies and Similar Technologies

We use cookies on our website. A cookie is a small text file which is placed onto your device (e.g., computer, smartphone or other electronic device) when you use our website. These help us recognise you and your device and store some information about your preferences or past actions.

You can set your browser to refuse all or some browser cookies and other similar technologies, or to alert you when cookies are being sent. If you disable or refuse cookies and other similar technologies some parts of our website and the Service may be not accessible or may not function properly. You can learn more about this and the cookies and other tracking technologies we use by reading our Cookie Policy.

How Your Data is Collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you register an account, contact us, send us feedback, or use our Service; and
- indirectly, such as from your browsing activity while using our Service.

How and Why Your Data is Used

We process your personal information under the following lawful bases and for the following reasons.

Your consent

We rely on your consent when we use your personal data for optimizing and enhancing the operation of our Service, developing new features and services (including when it is collected as a part to the aggregated data), and providing you with relevant advertising materials as long as it is

	<p>allowed by your device or browser’s personalization and privacy settings. You have a right to withdraw consent to processing of your personal data. You may enjoy this right at any time you wish. Please remember, that the withdrawal of consent does not mean that the processing before the withdrawal is considered thus illegal. We will do our best to verify your withdrawal of consent within 72 hours since the receipt of your request.</p>
<p>Compliance with our legal obligations</p>	<p>We rely on this ground to identify you and verify your identity or to help prevent and detect fraud against you or us, to protect the security of systems and data, or for disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, (e.g., to record and demonstrate evidence of your consents).</p> <p>All applicable laws depending on the relationship between you and us may affect the scope of personal data we collect, the ways we process your personal data, our ability to keep the confidentiality of your data and avoid their disclosure, duration of the planned retention, etc.</p>
<p>For the performance of a contract with you or to take steps at your request before entering a contract</p>	<p>We may rely on this ground to provide the Service to you or deliver our products to you.</p>
<p>To perform a task carried out in the public interest</p>	<p>We may rely on this ground of processing to report to the police or other competent enforcement agencies in case we discover fraud, threats to other users or any other violations of the applicable law or suspicious behaviour or actions committed on behalf of your use of our Service.</p>
<p>For our legitimate interests or those of a third party</p>	<p>We may rely on this ground to create and manage your account with us, to make non-marketing related communications to you, about changes to our terms or policies or changes to the Service or other important notices; to enable or administer our business (quality control, consolidated reporting, customer service), transfer of ownership and so on.</p>

Please note that when we received your explicit consent, we may run any automated decision-making devices or software including those based on all the data aggregated and may use personal information we collect for profiling. We use it since it delivers such benefits as increased efficiencies and resource savings in providing you the Service.

Marketing Communications

Where you have opted in to receive marketing communications from us, we may use your personal data to send you updates by email about our Service, including exclusive offers, promotions or new features and products. In using your personal data for such marketing purposes, we rely on your

consent. This means that we will use your details for marketing purposes only if you have consented to have such communications from us. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at info@allbionics.ai or using the 'unsubscribe' link in emails received from us. If you do choose to withdraw your consent, this will not mean that our processing of your personal data before you withdrew your consent was unlawful.

Your Rights

We undertake to guarantee the effective exercise of your rights as a data subject. Usually, you can exercise them free of charge. Nonetheless, we retain the right to do so in case we receive an excessive number of repeated requests.

Your rights are the following:

- The right to receive information about the data processing and a copy of the processed data;
- The right to demand the rectification of inaccurate data or the completion of incomplete data;
- The right to demand the erasure of personal data;
- The right to demand the restriction of the data processing;
- The right to receive the personal data concerning the data subject in a structured, commonly used and machine-readable format and to request the transmittance of these data to another controller;
- The right to object to the data processing;
- The right to withdraw a given consent at any time to stop a data processing that is based on your consent;
- The right to file a complaint with the competent supervisory authority.

To exercise your rights, please contact us (see "**Contact us**" section below). When you send us a request to exercise a right, you are asked to specify as far as possible the scope of the request, the type of right exercised, the personal data processing concerned, and any other useful element, in order to facilitate the examination of your request. In addition, in case of reasonable doubt, you may be asked to prove your identity.

We will do our best to answer you as soon as possible or within a reasonable period taking into account the complexity of the request, but in case we are processing a large number of requests the answer may take us longer than you might expect.

Disclosure of Your Data

Any information collected and processed by us is treated with the utmost confidentiality. We will make no public release of any personal information that is collected. We ensure we always include the controls and warranties embodied in this Privacy Notice to the contracts and agreements we enter into with our partners and contractors to whom we grant access to your personal data. Once they will have access to your data, they will provide the same equal protection as stated here.

We may be legally obliged to disclose your personal data to the competent state authority, enforcement agency or a court in case we receive a mandatory request for such disclosure from them, including to meet national security or law enforcement requirements and/or to comply with a judicial proceeding, court order, or legal process served on our Service. What is more, we may be proactive

and address the competent authority in case we suspect a violation of law to be committed in association with your persona via our Service.

If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

We may share your personal data with third parties helping us to run our business, e.g., website hosts (such as Amazon Web Services) and website analytics providers (such as Google Analytics). We use Google Analytics to better understand our audience and users, to improve our marketing campaigns, and to enhance our Service. To opt out of being tracked by Google Analytics across all websites, you can visit <http://tools.google.com/dlpage/gaoptout>.

We may also need to share your personal data with external auditors, professional advisors (such as lawyers and other advisors), law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations; or other parties in connection with a significant corporate transaction or restructuring. Usually, information will be anonymised, but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

Data Storage

We ensure that the personal data are not retained longer than necessary in relation to the purpose for which they are processed. In order to ensure compliance with this principle, we define the retention periods applicable to each processing operation. The following elements are considered when determining the retention period:

- legal obligations;
- recommendations of supervisory authorities;
- best practices;
- our operational needs.

Different retention periods apply for different types of personal data. Deleting your account will automatically entail deletion of your data, unless its storage is justified by legal obligation or our legitimate interest to do so. You may request a deletion of your account at any time by sending us an email at info@allbionics.ai.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

Data Transfer

It is sometimes necessary for us to share your personal data to countries outside the UK and/or EEA. In those cases, we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA on the basis of an adequacy regulation or (where such is not available) under legally approved standard data protection clauses recognised or issued under the applicable data protection laws. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK/EEA unless we can do so on the basis of an alternative mechanism permitted by data protection authorities.

By using our Service, you consent to the transfer of information that we collect about you, including personal information, to any country in which we or our service providers are located. When transferring your personal data, we will do all reasonable measures to verify that an importing entity has all necessary organisational and technical measures to secure your personal data.

Data Protection

The security of your personal information is of great importance to us. We use various kinds of technical, physical, electronic, and administrative security mechanisms that are designed to protect your data from loss, damage, deletion, misuse, unauthorized access, disclosure, or alteration. We also have procedures in place to deal with any suspected data security breach. If there's reason to believe that the data has been unlawfully acquired or accessed e.g., by unauthorized persons, if applicable, you will be notified about such data breach expediently.

How to Complain

Please contact us if you have any query or concern about our use of your information (see below **"Contact us"**).

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK, and
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA.

The UK's Information Commissioner may be contacted at [Link](#) or by telephone: **0303 123 1113**.

For a list of EEA data protection supervisory authorities and their contact details see [here](#).

Updates to this Privacy Notice

We may change this Privacy Notice from time to time. If we make significant changes, we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

Contact Us

You can contact us by post or email if you have any questions about this Privacy Notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Name: Simple Joint Stock Company Allbionics

Postal address: 60 Podole Str., Krakow, 30-394, Poland

Email: info@allbionics.ai