

# BalancAir Privacy Policy

Effective date: 30-JULY-2018

---

We believe that transparency is the key to any healthy relationship. We appreciate that you are trusting us with information that is important to you, and we want to be transparent about how we use it.

Here we describe the privacy practices for our app, software, website, and services. You will learn about the data we collect, how we use it, the controls we give you over your information, and the measures we take to keep it safe. We hope you will find this privacy policy clear, honest and transparent.

## 1. Information collected about you

### 1.1. Information you provide us

#### *Account information*

Some information is required to create an account on our app, such as your name, email address, password, date of birth, gender, height, weight, migraine information and treatment and incident history, and in some cases your mobile number for service support amongst other things.

#### *Additional information*

If you contact us or participate in surveys or promotions, we will collect the information you submit such as your name, contact information, and message.

#### *Information from third-party services*

If you choose to connect your account on our services to your account on another service, we may receive information from the other service. For example, if you connect to Facebook or Google, we may receive information like your name, profile picture, age range, language, email address, and friend list.

#### *Payment and card information*

When you make a purchase on our website, you provide your payment information, including your name, credit or debit card number, card expiration date, CVV code, and billing address. We do not store this payment information. We store your shipping address to fulfill your order. Note that third-party payment processors may retain this information in accordance with their own privacy policies and terms.

## 1.2. Information we receive from your use of our services

### *Device information*

This data informs us about the device you use to access our services, such as the model, name and identifiers, device settings, the app identifier, and crash information. On our website, we collect the information sent to us such your browser and browser settings, IP address, the operating system you use, and the system and language settings of your device.

### *Usage information*

When you use our app, go onto our website or interact with our marketing and brand campaign on different media and web sites, our servers will collect and process the data in order to understand your usage of our services. We collect this information and use it as aggregate data to better understand which features are the most relevant or useful to our users as whole.

## 2. How we use information

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, register migraine attacks or use certain other site features in the following ways:

- To model, modify, store, analyze data in order to perform research to develop new and exciting things such as predictive migraine algorithms to give you warnings of oncoming attacks;
- To help optimize your treatment and give personal and valuable feedback based on your usage;
- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested;
- To improve our website and app in order to better serve you;
- To allow us to better service you in responding to your customer service requests;
- To administer a contest, promotion, survey or other site feature;
- To ask for ratings and reviews of services or products;
- To follow up with them after correspondence (live chat, email or phone inquiries);
- To send you information regarding your account, payment etc.

## 3. How we share your information

We do not share your personal information except in the limited circumstances described below:

- **With your consent:** You may direct us to disclose your information to others, such as when you connect to Facebook, and other social tools;
- **Clinical Trial Studies:** With your consent, physicians and staff of clinical trial programs may use the service as a means of collecting data for the trial study. We will use and share information about the clinical trial collected through the service in accordance with our agreement with the clinical trial program and any privacy notices provided to you as part of the clinical trial program;
- **Health Researchers:** We may share data collected through the Service with healthcare researchers and other research organizations, including de-identified profile information and data collected from your connected devices. For example, we may share information such as your gender, height, weight, migraine history, but we will not share your name or other information that could identify you;
- **Service Providers:** We may disclose the information we collect from you to third party vendors, service providers, contractors or agents who perform functions on our behalf, such as providers of hosting, email communication, customer support services, analytics, marketing, and advertising, based on our instructions, and in compliance with this policy and any other appropriate confidentiality and security measures;
- **In Response to Legal Process:** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
  - Please note: Our policy is to notify you of legal process seeking access to your information, such as search warrants, court orders, or subpoenas, unless we are prohibited by law from doing so. In cases where a court order specifies a non-disclosure period, we provide delayed notice after the expiration of the non-disclosure period. Exceptions to our notice policy include exigent or counterproductive circumstances, for example, when there is an emergency involving a danger of death or serious physical injury to a person.
- **To Protect Us and Others:** We may also disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which we are involved.

## 4. Your consent for processing health and sensitive data

**By creating an account with BalancAir, you explicitly consent that:**

- i. BalancAir may store and process personal data you provide through the usage of the app and website, through the account creation process solely for the purpose of providing services to you and to improve our service features. Such services may include sending you information and reminders through the app or to the email address or mobile number you provided us;
- ii. Personal data you provide to BalancAir through the account creation process includes personal data you enter into the app or sign ups, such as your account data (e.g. your name and email address), and your migraine data;

- iii. We will not transmit any of your personal data to third parties, except if it is required to provide our service to you (e.g. technical service providers), unless we have asked for your explicit consent;
- iv. We may use your migraine data to create anonymized sets of data for academic and clinical research purposes. This anonymized research data cannot be linked to you as an individual or identify you in any way.

You may withdraw your consent to this use of your data at any time by deleting your account.

## 5. Your rights

We believe that privacy—including data privacy—is a basic human right. At BalancAir we strive to ensure that your rights are respected.

Here are some key facts about your privacy that we would like you to know:

- i. Our products and services have been designed to minimize the use of your personal data. We only collect and process your data for the purposes that have been previously outlined;
- ii. The security of our servers is routinely verified by experts to protect your data from unauthorized access. You can contact us at [support@balancair.com](mailto:support@balancair.com) if you have any questions about the security of our services;
- iii. We do not retain your data in an identifiable format for longer than necessary to deliver our services.

***As a user of BalancAir's services and website, you may exercise your user rights to:***

- i. Request information on your personal data processed by BalancAir. Upon your request, this information will be provided to you electronically;
- ii. Gain access to your information by requesting a backup of your data;
- iii. Correct your personal information and migraine data in the app settings;
- iv. Withdraw your consent from data processing at any time by contacting [support@balancair.com](mailto:support@balancair.com);
- v. Request the complete deletion of your data, including all past data sent to third-party services used for tracking and analysis, by reaching out to [support@balancair.com](mailto:support@balancair.com). Your data will be deleted within 30 days. If we cannot meet your request, we will notify you immediately and no later than one month after we have received your request. If we cannot meet your request, you have the opportunity to appeal to the Data Protection Officer;
- vi. Lodge a complaint with the relevant supervising authority if you believe BalancAir is processing your personal data under violation of applicable data protection regulations.

## 6. Data security

We have implemented reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

Our website and app are scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology. Please be aware that despite our best efforts, no data security measures can guarantee security.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

## 7. Data breach

We will notify you as soon as possible, no later than 72 hours, in case of personal data breach that we consider to be at high risk for your rights, including, for example, discrimination, identity theft or fraud, financial loss, reputation damage or social consequences.

## 8. Cookies

Our website and app uses cookies, which are small files/pieces of information that a site or its service provider transfers to your computer's/phone's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We primarily use cookies to:

Category of use	Purpose of the use
Preferences	To help us remember your settings and preferences, like your preferred language or the country you are in, so that we can provide you with a more personalized experience.
Authentication and Security	To log you into the services; enable us to show you your account data; and help us keep your data and the services safe and secure.
Service Features and Performance	To provide you with functionality and optimize the performance of the services. For example, to keep track of products you add to your shopping cart, allow you to share information social networking services like Facebook or Twitter; and improve our website's load speed and performance.
Analytics and Research	To help us understand how you are using the services so that we can make them better, faster, and safer.

<b>Advertising</b>	To enable our partners to serve ads for our products and services; deliver relevant ads to people who may be interested in them on other services; measure the performance of ads; and opt you out of receiving interest-based ads if that is your choice.
--------------------	--

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. We suggest consulting the help section of your browser or doing your own web research on how to disable cookies.

Please note: If you turn cookies off it will turn off some of the features of the site.

***By using our website and app, you consent that BalancAir may use cookies and third-party services, and collect your usage data under a unique identifier, for the purposes of tracking, analysis, and improvement of our website and app.***

## 9. Young users

Our services are not designed for users under 18. If we discover that a user under 18 has provided us with personal information, we will delete such information from our systems, within 30 days of discovery.

## 10.Changes to this privacy policy

BalancAir reserves the right to amend this Privacy Policy from time to time to reflect changes in the law, our data collection and data use practices, the features of BalancAir services, or advances in technology. Please check this page periodically for changes. If we make a change to this Privacy Policy that, in our sole discretion, is material, we will notify you by posting notice of these changes in this Privacy Policy.

## 11.How to contact us

You may contact us at any time by sending an email to [support@balancair.com](mailto:support@balancair.com) or through the app.