

# Viedoc Privacy Policy

Effective: Jan 1, 2022.

## Changes since previous version

The previous version of this policy had an effective date of Oct 8, 2020. Compared to that version we have made changes to the Partners paragraph to strengthen our email and SMS delivery capabilities, our privacy data protection, our disaster recovery resilience, and to enable the Viedoc Connect feature.

## About this policy

This web-based platform called **Viedoc** is provided by Viedoc Technologies AB ("**we**", "**our**" or "**us**"). We, in our capacity as data controller, have created this Privacy Policy to inform you ("**you**" or "**your**") about why we collect and how we process your personal data, i.e. your account information and your usage data.

This policy does not cover any eventual personal data that you may submit and process on this platform for other data subjects as part of activities of a study that you participate in. The policies covering such data are defined as part of the study and its data controller. Please ask your study contact for more information regarding these matters.

For your reference, you may download a printable PDF version of this policy located in the footer of Viedoc after login.

## Consent to Processing of Your Personal Data

By accepting this Privacy Policy using the designated check-box in Viedoc, and providing information to us, you understand and unambiguously consent to the following:

- We may process your personal data for the purposes specified in this Privacy Policy (see section *What Information We Collect and How We Use That Information*).
- We may process your personal data in the European Union, and with your approval share it with other processors, as specified in this Privacy Policy (see section *Sharing, Disclosure and Transfer of Personal Data*).

## What Information We Collect and How We Use That Information

### Your Account Information

As a Viedoc account holder we require you to provide your name, contact details, preferred language and some account security related information. We collect and use this data for the following purposes:

- to include it in the audit-trail in the studies you choose to participate in;
- to include it in the study datasets of the studies you choose to participate in;
- to display it in the administrative interface of the studies you choose to participate in;
- to contact you in connection with your registration or use of Viedoc;
- to review and verify your account information;
- to contact you in response to your inquiries, comments and suggestions;
- for specific purposes for which you volunteered;

- to ask for your participation in brief surveys;
- to notify you about updates or information regarding products and services provided by us;
- to generate aggregate statistical information; and
- as required by applicable law or regulation, or as requested by authorities.

## Your Usage Data

Viedoc automatically track certain information about your internet origin and browsing behavior when you use Viedoc (“**Usage Data**”). The information collected includes the timestamp, browser footprint, IP-address and URL used to access each resource in Viedoc, and what URL, if any, that provided the link to Viedoc. We collect and use this data for the following purposes:

- to display it in the administrative interface of the studies you choose to participate in;
- to measure the performance of Viedoc;
- to improve the design and functionality of Viedoc;
- to investigate issues;
- to protect from, and investigate possible, fraud or misuse of Viedoc; and
- as required by law or regulation, or as requested by authorities.

## Sharing, Disclosure and Transfer of Personal Data

### Study participation

The purpose of your usage of the Viedoc platform is typically to enable your participation in one or more clinical research studies. This requires us to share your personal data with these studies. This means we share a copy of the personal data you have provided us with, and that this copy is then covered by the Privacy Policy of that study.

Starting with version 4.42 of Viedoc, released on May 27<sup>th</sup> 2018, such information sharing must be explicitly approved by you. You will be prompted upon login to either approve or reject such requests from the study administrator. (If you log in through the API, any pending study invitations for the study in question will be automatically approved.)

For studies you have been involved in prior to version 4.42 of Viedoc, such information sharing has been implicitly approved and didn't require your explicit approval. These approvals can however also be explicitly revoked (see *Data Retention*).

### Locations

Your personal data may be processed by us at locations within the European Union.

Please note that, as part of having your information shared with studies, your information may be processed at other locations, covered by the Privacy Policy of those studies.

Please also note that whatever location you choose to use Viedoc from, when you access parts of Viedoc where your personal data is disclosed, you are, if only so temporary, in a strict sense, transferring your personal data to that location. This is important to consider if you are handling personal data of other data subjects as part of the studies you participate in, and we advise you to consult the Privacy Policy of those studies to make sure you do not violate those policies.

### Partners

We use services provided by Microsoft and their Azure services (using servers located in the European Union) to deliver the Viedoc service. This means your personal data will be processed on this third-party infrastructure, but the data is always encrypted and under our control. We also use services

provided by MailJet and Elastic Email (using servers located in the European Union) for email and SMS, SMS-Teknik (using servers located in the European Union) for SMS, OVH Cloud (using servers located in the European Union) for privacy data split processing, AWS – Amazon Web Services (using servers located in the European Union) for backup storage, audio/video streams, email and SMS, and WhereBy (using servers located in the European Union) for audio/video streams and UI of the Viedoc Connect feature.

### Merger or Sale

In the event of a sale, merger, liquidation, dissolution, sale or transfer of substantially all our assets, accounts information and/or usage data collected about you in Viedoc may be sold, assigned, or transferred to the party acquiring all or substantially all our equity and/or assets in order to permit the party to continue the operation of Viedoc.

### Other Disclosures

We may also access, disclose and preserve your personal data when necessary to (i) comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies, (ii) protect our customers or help prevent the loss of life or serious injury of anyone, (iii) operate and maintain the security of our services, including to prevent or stop an attack on our computer systems or networks, or (iv) protect our rights or properties, including enforcing the terms governing the use of the services.

### Correct Personal Data

All the personal data that you manually provide can be accessed and corrected by you. This is done by logging in to Viedoc and using the account features located in the upper right corner. If any of your contact information is incorrect, please update by modifying your profile. In addition to this you can also see aggregated excerpts of the usage data we have collected.

### Data Retention

You may choose to remove your account at any time. This is done by first revoking all the study accesses; when you have no approved study accesses and no pending invitations left, an account removal option will appear. Your personal data will be deleted if you choose to go ahead and use this option. The data will be removed from the online service immediately. Unless a longer retention period is required by law, or needed to investigate fraud or misuse of Viedoc, the information is removed from any backups as they cycle.

The copy of your information that you may have shared with studies as part of your participation will be retained according to the Privacy Policy of the respective study/studies.

### Use of Cookies and Local Storage

Viedoc uses both cookies and local storage. These are two technologies that we use for temporarily storing information on your computer while you use Viedoc. The purpose is to maintain the state and context of your current usage session, i.e. from the moment you go to the login page of Viedoc and until you log out and close your browser. We do not use your computer to store any personal data at any time and no information of any kind is left behind when you stop using Viedoc.

Your browser is probably set to accept cookies. If you choose to set your browser to refuse cookies, Viedoc will not function properly.

## Security

Your personal data integrity is of high concern to us. We have therefore implemented technology and security policies and procedures intended to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to, such information, reasonably appropriate to the nature of the data concerned.

All information sent to and from Viedoc is always encrypted, and we also encrypt all data at rest.

Viedoc has an optional feature for two-factor authentication that you can enable at any time. If you however participate in a study that requires this, you will also be required to use this.

Please note that you are responsible for ensuring that the computer, tablet or phone (or any other device) that you use to access Viedoc is secure and does not leak information.

## Contacting the Data Controller

If you have any questions about this Privacy Policy you can write to:

Data Protection Officer  
Viedoc Technologies AB  
Stationsgatan 23  
753 40 Uppsala  
Sweden

You can also email [dpo@viedoc.com](mailto:dpo@viedoc.com).

## Changes

Please note that we may update this Privacy Policy. You will be required to accept any updates to this Privacy Policy when you first log in to Viedoc after the changes are published. If you do not wish to be bound by any updated Privacy Policy, you can either stop using Viedoc and email us using the contact information in this Privacy Policy and ask for your account to be removed (make sure to send the email from the email address registered on the account), or first accept the updated Privacy Policy and then remove your account yourself.

## Governing Law

The validity, construction and performance of this Privacy Policy shall be governed by the substantive laws of Sweden, without giving effect to any conflict of laws principles. You consent to the exclusive jurisdiction of, and venue in, any court located in Sweden for the purposes of adjudicating any matter arising from or in connection with this Privacy Policy.