

## **Nicolab Services Privacy Policy**

***Last modified 23-Sep-2021***

### **1. Introduction**

At Nicolab, we respect your privacy regarding any information we may collect while operating our services. Personal Data means information that can directly or indirectly identify you or other individuals ("Personal Data"), for example first name, last name, or email address.

We do not disclose your Personal Data to any third party except to our affiliates and to data processors that assist us with providing our services or to authorities if we are required to adhere to laws or court order(s). With your consent we use cookies for marketing, performance and statistical purposes.

You always have the right to request information about your stored data, its origin, its recipients, and the purpose of its collection at no charge. You also have the right to request that it be corrected, blocked, or deleted. You can contact us at any time using the address given of our Data Protection Officer below. If you have further questions about the issue of privacy and data protection. You may also, of course, file a complaint with the competent regulatory authorities.

### **2. General provisions**

This Privacy Policy applies to Personal Data processed by Nicolab (hereinafter, "us", "we") in connection with the operation and services we offer to you through our subscription services, the StrokeViewer app and the website ([nicolab.com](https://nicolab.com)) (collectively referred to as "Services"). This Privacy Policy explains what Personal Data may be collected, how we use it, how you may exercise your rights, and under what circumstances we may disclose this data to third parties.

Personal Data is administered by Nicolab B.V., registered with the trade register of the Chamber of Commerce in Amsterdam under registration number (KvK): 64531775, with principal place of business and address for service at Paasheuvelweg 25, 1105BP, Amsterdam, The Netherlands.

Nicolab has appointed a Data Protection Officer who can be contacted at the following address: [infosec@nico-lab.com](mailto:infosec@nico-lab.com).

We process your Personal Data to provide you the Services. Personal Data submitted through the Services will be processed in accordance with applicable data protection laws.

By using our Services, you agree that we are processing your Personal Data in accordance with the terms set out in this Privacy Policy. If you do not wish that we process your Personal Data in this way or you do not agree with the terms hereof, please do not use our Services.

In addition, a separate agreement between us and our customer governs delivery, access and use of the Services (the "Customer Agreement"), including the processing of any Personal Data, files or other content submitted through use of the Services (collectively, "Customer Data"). The organization (e.g., your employer or another entity or person) that entered into the Customer Agreement ("Customer") controls certain aspects of their use of the Services (their "Deployment") and associated Customer Data, for example, how long Nicolab will retain Customer Data.

To the extent processing of your Personal Data is based on your consent, we will not change the scope of such processing, unless you have given additional consent to the changed scope of such processing.

If you are employed by a Customer, this Privacy Policy together with the Customer Agreement set forth the provisions and policies governing your use of our Services.

### **3. Scope of personal data collected**

We may process the following Personal Data as a result of our Customer or Nicolab granting access to individuals to a Deployment ("Authorized Users"). In addition we may collect data on in-application settings such as notification preferences and preferred method of logging in.

Data collected to enable Authorized Users to use the Services:

- Email address
- Preference for pincode (including the pincode when this option is chose) or Biometric Fast Login
- Push notifications preference (on/off)
- Push tokens (a token whereby the mobile phone of the user can be targeted for push notifications)

StrokeViewer can be accessed through a browser with the address [StrokeViewer.com](http://StrokeViewer.com).

Data collected through the [StrokeViewer.com](http://StrokeViewer.com) website:

- Session cookies

Authorized Users must first undergo training before using the Services. Training content may differ depending on the job description of the user and information on training will be communicated via email.

Data collected for training purposes:

- Email address
- Job title

Nicolab offers support with technical issues regarding use of the Services. When the support desk is contacted the following details may be collected to better assist with the issue.

Data collected for technical support services:

- Email address
- Name
- Phone number
- Employer

Additional data:

- Log data: As with most technology services delivered over the Internet, our servers automatically collect information when you access or use our Services and record it in log files.
- Customer data: Deployments are configured to send Customer Data to Nicolab for using the Services, for example digital computed tomography (CT) studies may be sent to Nicolab through the Services in order for an artificial intelligence algorithm to detect suspected conditions such as a large vessel occlusion. Customer Data includes data concerning health. Such sensitive data, that require explicit consent by the data subject, is governed by the Customer Agreement between the Customer and Nicolab and not by this Privacy Policy.

#### **4. Purpose of Personal Data collected & Legal basis.**

Applicable data protection legislation allows Nicolab to process your Personal Data for the purpose of performance of the Services, as defined in the relevant Customer Agreement (your employer) or on the basis of your consent.

#### **5. Duration of Personal Data storage**

The Personal Data is stored for the time needed for the performance, termination, or expiration of a Customer Agreement and once our statutory obligations to preserve records have expired. Additional provisions on duration of data storage are made under the Customer Agreements.

#### **6. Data recipients**

##### **6.1. Service providers (processors)**

To ensure the proper functioning of the Services, including the performance of Customer Agreements, Nicolab uses external services (such as third-party software). We use only services provided by such data processors who can properly guarantee that appropriate technical and organizational measures are implemented to ensure the compliance of Personal Data processing with the requirements of the applicable data protection laws and protect the rights of the persons the data pertains to.

Nicolab discloses data only if it is necessary to pursue a specific purpose of data processing and only insofar as it is necessary to achieve such a purpose. Personal Data of the user of our Services may be disclosed to the Service Providers in order to supply us with the technical, IT, and organizational solutions needed by Nicolab to carry on its business activity. We disclose the user's Personal Data to a contracted supplier only if and insofar it is necessary to achieve a specific purpose of the data processing hereunder.

##### **6.2. Other recipients (controllers)**

We may share your Personal Data with the following controllers (i.e. third parties that process your Personal Data for their own purposes):

- law enforcement or other agencies if we are required to do so by law, or by a warrant, subpoena or court order to disclose your Personal Data.

#### **7. What countries do we transfer your Personal Data to**

Personal data provided under the Nicolab services will not be transferred by us outside the European Union.

#### **8. Rights of the person the data pertains to**

You have the rights to your Personal Data that are described below.

- Right to access, rectify, limit, delete, or move Personal Data – the person the data pertains to has the right to request us to provide him or her with access to his or her Personal Data, to rectify or delete such data (“the right to be forgotten”), to limit or object the processing thereof, as well as to have his or her data moved.
- Right to withdraw the consent at any time – the person whose Personal Data is processed by Nicolab based on such a person's consent-is entitled at any time to withdraw his or her consent, this not affecting the right to process such data based on the consent before it was withdrawn.
- Right to lodge a complaint – the person whose Personal Data is processed by Nicolab is entitled to lodge a complaint with the supervisory authority.

- Right to make an objection – the person whose Personal Data is processed is entitled to raise at any time an objection against his or her data being processed.

You can exercise your rights by contacting us at [infosec@nico-lab.com](mailto:infosec@nico-lab.com) so that we may consider your request in accordance with applicable law. When we receive your rights request via email, you accept that we may take steps to verify your identity before complying with the request to protect your privacy and security, for example by contacting you or your employer in order to establish your identity and your qualification as an Authorised User.

## **9. Security**

Considering the nature, scope, context, and purposes of data processing and the risk, however likely and imminent, of violating any right or freedom of natural persons, Nicolab implements appropriate technical and organizational measures to make data processing compliant with applicable data protection laws and be able to prove it. Our security measures are being improved continuously as technology develops.

### **9.1. Technical measures**

Nicolab takes technical measures to prevent unauthorized persons from intercepting or altering any Personal Data that is transmitted electronically. Nicolab is ISO 27001 and ISO 13485 certified.

### **9.2. Links to external sites**

Our Services may contain hyperlinks to external websites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. Once you have left our Services, we cannot be responsible for the protection and privacy of any information which you provide. We strongly advise you to review the Privacy Policy and Terms and Conditions of every website you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites, products or services.

## **10. Privacy Policy changes**

This Privacy Policy may be updated from time to time to reflect changing legal, regulatory or operational requirements. Nicolab encourages visitors to frequently check this page for the latest information on our privacy practices. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.