



Epione SPRL / Helpilepsy

Privacy Policy – Website & Mobile App

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Please read our Privacy Policy carefully as it explains the following:

- What personal information we collect from you and for which purpose (Section 3 and 4)
- The measures to safeguard the access to and the security of your Personal Data (Section 5);
- Your rights to access, rectify, erase your Personal Data and object to the processing of your Personal Data (Section 8).

In order to use the Products, you must first acknowledge and agree to our Privacy Policy. You cannot use the Products without first accepting our Privacy Policy.

1. General

Epione provides Helpilepsy, a digital platform for people with epilepsy and their physician to help in the epilepsy care. Helpilepsy consists of the Helpilepsy Dashboard for Patient, Helpilepsy Dashboard for Physician, the Helpilepsy Mobile Application and the Helpilepsy Platform (each as defined hereinafter and collectively the "**Application**"). The Helpilepsy Platform is the engine of the Application and interacts with and transmits data between the (i) Helpilepsy Mobile Application; (ii) the Helpilepsy Dashboard (for Patient & Physician). In addition, the Helpilepsy Platform also stores data. The Helpilepsy Dashboard (for Patient & Physician) is an online tool with the sole intention to display, add and store your data.

The Data (as defined hereinafter) is automatically transferred to the Helpilepsy Dashboard (for Patient & Physician) through the Helpilepsy Platform. Please note that this automatic transfer to the Helpilepsy Dashboard for Physician is only possible after you have made the link between yourself and your Physician by correctly linking your Physician's Helpilepsy account through your mobile device. Correctly linking your Physician's account to yours through your mobile device is your sole responsibility.

Please note that you are not obliged to install the Application and your refusal to install the Application does not have any impact on the quality treatment by your Physician.

Epione SPRL ("**Epione**", "**we**", "**us**") recognizes and understands the importance of the privacy of its users ("**Users**", "**you**") and wants to respect their desire to store and access personal information in a private and secure manner. This Privacy Policy applies to our Application and our Website (collectively the "**Products**") and describes how Epione manages, stores and utilizes your Personal Data through its Products.



In order to use our Products, we require you to consent to the collection and processing of your Personal Data before you start using the Products. If you do not agree with any of the terms of this Privacy Policy, you may not use in any manner the Products.

Epione is committed to protecting the privacy of all of its Users Personal Data and providing a secure, user-controlled environment for the use of the Products in accordance with the Privacy Act of 8 December 1992. At the same time, you also share responsibility for maintaining privacy and security for example, by not allowing any third party to use your personal account on the Helpilepsy Mobile Application and Helpilepsy Dashboard (for Patient & Physician). Epione asks all Users to be responsible for safeguarding any authentication information and to immediately notify Epione of any unauthorized use of your personal Account.

Please read this Privacy Policy carefully (which is also available on our Website: www.helpilepsy.com) so that you fully understand how we obtain and process your Personal Data. By accepting this Privacy Policy, you acknowledge and agree that you were adequately informed of the functioning and objectives of the Application.

2. Definitions

"Account" means your account registered through the registration process on the Helpilepsy Mobile Application or Helpilepsy Dashboard (for Patient & Physician);

"Application" means the (i) Helpilepsy Platform; (ii) Helpilepsy Mobile Application; (iii) Helpilepsy Dashboard for Patient; (iv) Helpilepsy Dashboard for Physician;

"Helpilepsy Dashboard for Patient" means the web-based applicatio made available to the Users;

"Helpilepsy Mobile Application" means the mobile application (i) which the User has to download on its mobile device and (ii) is intended to record (via user input), display, store and transmit your Data;

"Helpilepsy Platform" means the platform on which the Helpilepsy Mobile Application and the Helpilepsy Dashboard (for Patient & Physician) are connected and collectively function. Depending on the user profile (User, Physician, ...) different application functions can be made available;

"Physician" means the doctor (or other medical expert) from which you potentially obtained the prescription to use the Helpilepsy Mobile Application (you do not need the prescription to use the Mobile Application); By default, your doctor does not have access to your data;

"Helpilepsy Dashboard for Physician" means the web-based application that is accessible by your Physician to allow your Physician to review patient information about you, including but not limited to the Data. This application is also connected with the Helpilepsy Platform; Please note that your Physician has only access to your Data if you have linked him to your Account.

"Products" means the Application, Website and Documentation;

"Data" means the data collected via the application and rendered in an optimal way by the Helpilepsy Platform through the Helpilepsy Mobile Application and Helpilepsy Dashboard (for Patient & Physician).



"Third Parties" means any natural or legal person or entity other than Epione;

"Website" means the website available at www.helpilepsy.com.

3. Information we collect

We may collect several types of personal information from the Users of our Products, and store it on your mobile device and/or our server such as:

- Contact information (e.g. your name, postal address, e-mail address, and mobile or other telephone number);
- The profile data provided by you on your account such as your name and profile picture;
- Image or Video data such as any images or video via the camera of your mobile device captured using the Application;
- Information in helpdesk support inquiries;
- Patient demographics such as date of birth and gender;
- Information about your health conditions, and other health related information (e.g. medicine usage);
- Information about your device, such as its model, unique device identifier and operating system version;
- Information collected by manual input by the Application, such as seizures, side effects, medication, etc.;
- Image data such as any images via the camera of your mobile device captured using the Application;
- Payment information such as transaction identifiers and summary information that does not include credit card or bank account numbers (we do not collect or store financial account information);
- Information from third party devices and services such as heart rate BPM (beats per minute), step count, activity sample, distance, active energy, blood glucose, oxygen saturation, resting energy, sleep analysis, diastolic blood pressure, systolic blood pressure, flights climbed, weight, and workouts. We will request your permission to access health-related information from third-party devices or services, such as Google Fit or Apple Health. The third parties may offer you tools to limit which data that we access. and
- Web behavior information such as information related to how the Users use the Products (e.g. browser type, domains, page views) collected through cookies and other automated technology (cfr. Section 6 "Cookies").

Hereinafter collectively "**Personal Data**".

We shall store your Personal Data on our servers located in the European Economic Area (AWS - Frankfurt - Germany).

We would like to draw your attention to the fact that Personal Data consisting of patient medical data is also protected by medical secrecy rules.

4. How do we use your Personal Data



Epione (i) collects, (ii) uses, (iii) maintains and (iv) may share your Personal Data provided by you or collected by us with its affiliates, parent companies or other related companies for all purposes necessary to ensure the proper functioning and operation of the User accounts and/or the proper functioning of the Products. These purposes may include (collectively the "Purpose"):

- Creating and managing your Account to use the Application;
- Providing information and allowing the Users and the Physician access to the Products;
- Diagnosing technical problems and managing technical support and processing inquiries concerning the Products;
- Contacting the Users by phone, email, text message or push notifications (if they are enabled) to (i) verify your account (ii) for information and operational purposes such as account management, instructions, alerts, reminders, customer service, system maintenance and others
- Contacting the Users to (i) communicate about, and organize your participation in market research or (ii) obtaining testimonials;
- Commercializing the Application;
- Performing data analyses (including anonymization and aggregation of Personal Data) and using and sharing the resulting data to third parties for commercialization purposes;
- The operation, evaluation and improvement of the Products (including the development of additional products and/or services, enhancing and improving the current Products, analysis of our Products, quality control activities and performing internal business functions such as accounting and auditing);
- Protecting against, identify and prevent fraud and other unlawful activity, claims and other liabilities;
- Complying with and enforcing any applicable legal obligations with respect to our Terms of Use and Privacy Policy.

Furthermore, you agree that Epione is free to access, retain, and disclose Personal Data in the following events:

- In order to be in compliance with any applicable legislation or regulations;
- If a law enforcement authority or other government official requests so;
- To enforce the Epione Terms of Use or Privacy Policy
- The investigation of any suspected or actual fraudulent or illegal activity and
- To protect your or our safety and/or rights.

By using the Application, you acknowledge and explicitly agree that we may disclose certain information to vendors and service providers who help us provide the Products. Examples of these vendors and service providers include entities that process credit or debit card payments and provide analytics and web hosting services.

By using the Application, you acknowledge and explicitly agree that we disclose your Personal Data to your Physician by giving him access through the Dashboard for Physician to your personal data and your personal profile on your Account.

By using the Application, you acknowledge and explicitly agree that, with your permission, we will share some health-related information, such as your heart rate, with third party devices and services, such as Apple health and Google Fit. If you connect your Helpilepsy account to a third-party device



or service, you may be asked to share your information with that application. We will not share your information without your permission.

You furthermore understand and agree that the technical processing and transmission of the Products, including your Personal Data, may involve (i) transmissions over various networks; and (ii) modifications to conform and adapt to technical requirements of connecting networks, or devices .

5. Security

Epione shall take appropriate administrative, technical and organizational measures against unauthorized or unlawful processing of any Personal Data or its accidental loss, destruction or damage, access, disclosure or use. Upon written request, Epione can provide you with a list of people of Epione that may have access to your Personal Data. These people have entered into confidentiality agreements prior to having been granted access to your Personal Data.

In the event of and following discovery or notification of a breach of the security of the Personal Data, or access by an unauthorized person, Epione is required by law to notify the User if the breach is likely to affect your privacy.

6. Cookies

When using the Products, we may collect certain information by automated means, such as cookies (small text files stored in your browser) and similar technologies, including mobile application identifiers, to improve your experience of the Products, increase security, measure use and effectiveness of the Products, identify and resolve issues and marketing purposes. We may also use cookies and other automated means for purposes such as management our Products and other aspects of the commercialization of our business.

The information we collect in this manner includes IP address, browser characteristics, device characteristics, operating system version, information on actions taken on our Products (such as usage, activity logs an click-throughs), and dates and times of visits. Log data is promptly deleted on a regular basis.

You can control cookies through your browser settings and other tools. Your device may offer you control over the use of cookies or other technologies when you use the Products. For example, you may be able to set your device or browser to disable, clear, reset or block the use of cookies or similar technologies. Please note, however, that without cookies the Products may not work properly or you may not be able to use all of their features.

Third parties, such as google analytics, may also use cookies to collect information about your activities on our Products to understand and continue improving the performance of our Products. Please check the relevant third party website for more information about their use of cookies. Where this site allows such cookies to be set or you access other websites from the Products using the links provided, the operators of these websites will use cookies in accordance with their own cookies policy, which may differ from ours.

By continuing to use our Products, you consent to the placement of cookies and other automated means in your browser and device in accordance with this Privacy Policy.



7. Disclosure to Third Parties

In the event of full or partial merger with, or acquisition of all or part of Epione, we may transfer your Personal Data to a Third Party. In such event, Epione shall impose this Third Party to use any Personal Data strictly consistent with this Privacy Policy.

Other than as set out in this Privacy Policy, we shall not sell or otherwise disclose your Personal Data to Third Parties without obtaining your prior explicit consent unless this is necessary for the purposes set out in this Privacy Policy or unless we are required to do so by law.

We may also share Personal Data with Third Party service providers who help us to provide, understand, commercialize and improve our Products. We do not authorize these Third Party service providers to use or disclose your Personal Data except as strictly necessary to perform any services under our supervision or to comply with applicable legislation. We seek to provide any such Third Party service provider with only the Personal Data they need to perform their specific function.

In any event, such Third Party service providers shall be obliged to treat your Personal Data in accordance with this Privacy Policy. However, Epione cannot be held liable for any damages, whether direct or indirect, that may result from the misuse of your Personal Data by such Third Party service providers.

8. Your rights

Right of access If you are concerned or have any questions about your Personal Data, you have the right to request access to the Personal Data which we hold or process about you. We will then provide you with information about the data that are being processed and on the source of those data.

Right of rectification and right of erasure You have the right to request us free of charge to correct, erase or block any inaccuracies in your Personal Data if such Personal Data would be incomplete, inaccurate or processed unlawfully.

Please note that you can change your account information in the Application at any time on the "settings" pages.

Right to not be subject to automatated individual decision making You have the right to request us not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Right to object to data processing Without prejudice to the termination provisions of the Terms of Use, you may withdraw at any time your consent to the processing of your Personal Data by Epione by permanently removing the Application and notifying us in writing thereof. Upon receipt of this notification, Epione shall promptly stop any processing of your Personal Data. You may also ask us to stop using your Personal Data for direct marketing purposes.

To exercise your abovementioned rights or any other questions concerning this Privacy Policy, please contact us by e-mail at info@helpilepsy.com or by writing to Epione SPRL, Avenue Gustave Latinis 88, B-1030 Schaerbeek.



9. Data retention and deletion

We may retain information regarding you and your use of the Products, including Personal Data, for as long as reasonably needed to provide you with the Products and the uses described in this Privacy Policy.

Please note that we retain your Personal Data even if you temporarily stop using the Application until you permanently delete the Application on your mobile device and notify us thereof. Upon notification, we may retain and continue to use and disclose your Personal Data to Third Parties exclusively on a fully anonymized basis.

10. Third Party websites or applications

You acknowledge and agree that certain content or services provided by Third Parties may be made available to you through the Products. You agree that such linked content or services may have their own privacy policies for which Epione cannot be held responsible. Epione does not in any way review or endorse the privacy practices of such Third Parties.

11. Updates or changes to our Privacy Policy

Occasionally, we may change or update this Privacy Policy to allow us to use or share your previously collected Personal Data for other purposes. If Epione would use your Personal Data in a manner materially different from that stated at the time of the collection, we will provide you with a notice on our Website and in our Helpilepsy Mobile Application indicating that the Privacy Policy has been changed or updated and request you to agree with the updated or changed Privacy Policy.

Controller

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