



TP0586 Qbtech Privacy Policy

Revision: 2.1

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1. INTRODUCTION

Qbtech AB is a company registered in Sweden (Organisation Number: 556624-6996), with a registered address at Cardellgatan 1, 114 36 Stockholm, Sweden.

This Privacy Policy describes how Qbtech AB (“Qbtech”, “we”, “us”) collects, uses, shares, and protects personal data in connection with its digital services and platforms, including QbClinic, QbPath, QbCheck, QbMobile, and related administrative systems.

The Privacy Policy provides a complete explanation of how we process personal data, including sensitive health-related data or protected health information, in accordance with applicable data protection laws such as the General Data Protection Regulation (GDPR), UK GDPR, and other relevant national legislation, such as HIPAA.

This document also includes references to Qbtech’s use of cookies and tracking on our websites.

2. ROLES AND RESPONSIBILITIES

- **Data Controller:** Healthcare providers, schools, or clinical organizations using Qbtech's services acts as data controller.
Qbtech acts as data controller for our websites and marketing tools used for commercial purposes (this does not include sensitive personal data or protected health information).
- **Data Processor:** Qbtech acts as a data processor on behalf of the data controller that is using Qbtech's services.
- **Joint or Independent Controller:** In limited cases, such as separately regulated research- or product development projects, Qbtech may act as a joint or independent controller.

3. DATA WE COLLECT

Depending on the Qbtech service used, the following categories of personal data may be collected:

- **User Profile Information:** Name, email address, role, organization affiliation.
- **Test Data:** Date of birth, biological sex, medication use, device interaction data (e.g., screen taps, space bar clicks, face movement - no video recordings).
- **Device and Usage Information:** IP address, device type and OS, browser type, administrative metadata such as session times, screen settings, and language preferences.
- **Health-related Data:** Symptoms, diagnosis, side effects, family/lifestyle context, treatment responses, responses to ADHD- and mental health related questionnaires and healthcare provider notes.

On our websites, we may collect data through cookies and similar technologies to analyze traffic, personalize content, and support marketing efforts. For information on our cookie practices and consent, please refer to our specific policies for the respective services. For Qbtech.com, see: <https://www.qbtech.com/cookie-policy/>

4. LEGAL BASIS FOR PROCESSING

Qbtech processes personal data on behalf of the controller under the following legal bases:

- **Performance of Contract:** Necessary for delivering the services.
- **Legal Obligation:** Required for regulatory reporting, legal proceedings, and audits.
- **Public Interest/Healthcare:** Processing is necessary for the provision of healthcare (GDPR Article 9(2)(h)).
- **Legitimate Interests:** For security, troubleshooting, and product improvement.
- **Consent:** When legally required, particularly for participation in scientific research.

When Qbtech processes personal data as a controller, this is done based on **consent, legitimate interests** or for **performance of a contract**.

5. PURPOSES OF PROCESSING

Qbtech processes personal data on behalf of the controller for the following purposes:

- To enable clinicians and other qualified professionals to assess, diagnose, and treat ADHD.
- To provide test results and data visualizations.
- To maintain and improve service functionality.
- To comply with legal and regulatory obligations.
- To protect our legal rights.

When Qbtech processes personal data as a controller, this is done for research and product development alternatively to support marketing and commercial operations.

6. DATA SHARING

Qbtech may share personal data with:

- **Service Providers:** Who support hosting, technical operations, or support services. These providers are contractually bound to comply with data protection obligations.
- **A Party in a Corporate Transaction:** Such as mergers, acquisitions, or asset sales.
- **Authorities:** Where required to comply with legal obligations or defend legal claims.

Sharing of any sensitive personal data / protected health information is regulated in Data Processing Agreements and Business Associate Agreements (US) between Qbtech and data controllers.

7. INTERNATIONAL TRANSFERS

Qbtech ensures that personal data is stored and processed within the region in which it is collected - specifically, within the European Economic Area (EEA) and the UK, or within the United States. We do not transfer personal data across these regions (e.g., from the EEA/UK to the US or vice versa) unless:

- The Data Controller has explicitly approved such transfer, or

- The transfer is a Restricted Transfer necessary for the provision of second-line support services, for which the Controller provides prior general authorization.

All transfers of personal data to third countries are carried out in compliance with applicable data protection laws, Data Processing Agreements and Business Associate Agreements (US). Where required, Qbtech ensures that such transfers are subject to appropriate safeguards, including the use of:

- Standard Contractual Clauses (SCCs)
- UK International Data Transfer Addendum
- Adequacy decisions from the European Commission or UK Government

In all cases, such transfers will be documented and protected according to applicable data protection legislation.

8. DATA RETENTION

Personal data is retained only for as long as necessary to:

- Fulfil contractual obligations
- Provide our services
- Comply with legal and regulatory requirements

Upon termination of service, personal data will be returned or securely deleted/anonymized in accordance with documented policies. Qbtech may, however, use data in anonymized form for statistical purposes, product development, marketing/PR, cybersecurity and other security related areas in accordance with agreements and instructions from the controller.

9. DATA SUBJECTS RIGHTS

Individuals may under applicable data protection laws have the rights to:

- Access their personal data
- Rectify or erase their personal data
- Restrict or object to processing
- Data portability
- Withdraw consent (if applicable)
- File a complaint with a supervisory authority

If your data is processed by Qbtech on behalf of a healthcare provider or school, please contact them directly. If Qbtech is acting independently, contact us at privacy@qbtech.com.

10. SECURITY

Qbtech implements appropriate technical and organizational measures to protect personal data, including:

- ISO 27001 certified Information Security Management System
- TLS (HTTPS) encryption
- Pseudonymization
- Role-based access controls
- Continuous security monitoring and regular software updates

11. RESEARCH AND ANONYMIZATION

Qbtech may use anonymized data for:

- Scientific research in collaboration with academic or clinical institutions
- Machine learning and product optimization
- Statistical and security analysis

Anonymization is performed using industry-standard methods. No individual can be re-identified.

12. CHANGES TO THIS POLICY

Qbtech reserves the right to revise this Privacy Policy from time to time. The date of the most recent change is stated in the Privacy Policy. If Qbtech makes any changes to the Privacy Policy, Qbtech will publish these changes on Qbtech.com. The User is advised to read this Privacy Policy on a regular basis to note any changes.

Material changes to the Privacy Policy will be notified to you where you have provided us with contact information.

13. CONTACT INFORMATION

Qbtech AB, Cardellgatan 1, 114 36 Stockholm, Sweden

Email: privacy@qbtech.com