

<b>POLICY</b>					
<b>ToMaSSApp Privacy Policy</b>					
<b>Document Number:</b>	STL-POL-005	<b>Revision No:</b>	01	<b>Revision Date:</b>	Aug-2022

## 1 REVISION HISTORY AND CHANGE DETAILS

Change Details	Revision Number	Release Date
Initial Release	01	Aug-2022

## 2 INTRODUCTION

At Swallowing Technologies (Company), we understand the importance of privacy and the protection of your personal information and non-personal information. Swallowing Technologies complies with applicable laws to ensure delivery of privacy and protection.

## 3 PURPOSE

This Privacy Policy addresses privacy with the use of ToMaSSApp (Application).

## 4 EFFECTIVE DATE

The Privacy Policy is effective from August-2022.

## 5 WHAT DATA DO WE COLLECT AND WHY DO WE COLLECT IT?

The Company collects both information identifiable about an individual e.g., name, email (Personal Information) and information that doesn't personally identify an individual or information that has been anonymized (Non-Personal Information) for the reasons described below.

Disclosure of information by You to the Company is voluntary. Choosing not to permit collection of information by the Company will lead to an ability to access and use the Application..

### 5.1 REGISTRATION FORM

We collect the following Personal Information:

- First Name
- Last Name
- Email Address
- Organisation
- Country

We collect Your Personal Information when You voluntarily download the Application from the Google Play Store (Application Store).

We collect the following Personal Information to:

- Maintain a database of users to notify them about changes to the Application
- Maintain a data of users to notify them about new Company Products and / or Services
- Identify the types of organisations that use the Application
- Enhance, modify or otherwise improve the Application and the Company's services

### 5.2 APPLICATION DATA COLLECTION

When using the Application, You may perform any one or a combination of the following voluntary actions:

1. Share deidentified patient information collected with the Company.
2. Save deidentified patient information locally on the Application.

When You voluntarily share / save non-personal information, the following is collected:

- Patient Identifier
- Patient Gender
- Patient Age Group
- Cracker Selection
- Number of Bites
- Number of Masticatory Cycles
- Number of Swallows
- Time Taken
- Results (patient score relative to normative data)

We collect shared data to add it to our Normative Data database to improve accuracy and overall usability of the Application. Saved data cannot be accessed by the Company without Clinician intervention.



**NOTE: A random patient identifier is generated for each patient. This may be overwritten by the Clinician without interference from the Application. If non-deidentified patient data is shared with the Company, the Company has appropriate measures in place as described in Section 8. For data that is saved locally on the Application, it is the responsibility of the Clinician to implement appropriate measures to prevent unauthorised access to the data.**

## 5.3 COOKIES

We indirectly collect your Non-Personal Information through cookies.

We collect this information so that we can:

- Measure the number of the Application downloads
- Understand the performance of the Application
- Improve the usability / quality of our Application

We do not collect IP addresses.

## 6 WHO WILL COLLECT AND HOLD INFORMATION?

Name	Trade Name	Address
Swallowing Technologies Limited	Swallowing Technologies	Leinster Chambers, Level 1, 249 Papanui Road, Strowan, Christchurch 8014 New Zealand

## 7 WHO WILL HAVE ACCESS TO THE INFORMATION?

The intended recipients of the collected data will be:

Recipient Name	Recipient Address
Swallowing Technologies Limited	Leinster Chambers, Level 1, 249 Papanui Road, Strowan, Christchurch 8014 New Zealand

Swallowing Technologies shall use the following Data Processors:

Data Processor	Purpose
Swallowing Technologies	Collection of personal and non-personal information to improve accuracy and usability of the Application.
Firebase	Collection of personal information during registration to support use of the Application and direct marketing.
Google	Collection of non-personal information (cookies) to understand use and performance of the Application.

To enable delivery of Products and/or Services, the Company may disclose collected data to third parties such as our suppliers, consultants, and other representatives who may be based outside of Australia, New Zealand and Europe.

The Company shall not sell or rent your Personal Information.

## 8 PROTECTION OF INFORMATION

All information is protected against loss, unauthorised access, modification or disclosure and other misuse through security and storage in our database. Our database has restricted access to Company staff only who can only use your Personal or Non-Personal Information for the permitted reasons described in Section 5.

Any parties authorized by the Company to process Personal Information have demonstrated security measures which ensure full compliance with applicable data protection laws e.g., GDPR.

Information provided to any parties in connection with the provision of Products and/or Services, the Company will do everything reasonably within its power to prevent unauthorised access or disclosure of the information.

If there is a violation in our security systems, leading to non-permitted access to your Personal Information, we will contact You by email on the basis it has been provided upon registration.

## 9 ACCURACY OF INFORMATION

Personal Information collected by the Company is voluntarily provided by You. As such, the accuracy of the Personal Information we receive is dependent on what You provide.

The Company shall endeavour to ensure that any information that is incorrect is corrected and updated when specific requests to do so are made in accordance with Section 11.

Where Personal Information is disclosed to further the use of Products and/or Services, the Company shall ensure that the information is accurate, up to date, complete, relevant, and not misleading.

## 10 RETENTION OF PERSONAL INFORMATION

The Company shall not retain Personal Information for longer than is required for the purposes for which the information may be lawfully used.

## 11 INFORMATION RIGHTS

You have the right to consent to the Company collecting Your Personal and Non-Personal information.

You have the right to confirm if the Company holds any Personal Information about You.

You have the right to access, correct, erase, or restrict processing of Your Personal Information at any time.

A formal request shall be made in writing addressing Privacy Officer at [privacy@swaltech.com](mailto:privacy@swaltech.com)

There may be instances that the Company may require additional information to confirm Your identity

The Company shall provide the information free of charge unless the request is manifestly unfounded or excessive. If the request is found to be the latter, the Company shall provide rationale for either:

1. Charging You for the request to account for administrative costs of providing the information
2. Refusing to act on Your request

There may be instances where the Company is unable to identify You. If this instance occurs, then the Company may be unable to act upon Your request.

If dissatisfied with how the Company manages your request, You have the right to lodge a formal complaint with the appropriate authority.

Location	Authority
Europe	Member State Supervisory Authority
Australia	Office of the Australian Information Commissioner
New Zealand	Privacy Commissioner

You have the right to object to the processing of your Personal Information at any point in the process. Once an objection is made, the Company shall no longer process your Personal Information.