

## PRIVACY NOTICE

### Users of QbCheck

#### 1 INTRODUCTION

In this privacy notice (the “**Privacy Notice**”) we explain how Qbtech AB (“**we**”, “**our**”, “**us**”, or “**Qbtech**”) processes personal data about you (“**you**”, “**your**”, or the “**User**”) who use our software QbCheck for assessing the three core symptoms of ADHD – hyperactivity, inattention and impulsivity – in children, adolescents and adults (the “**Software**”), in your capacity as employed by a clinic, healthcare provider, or other party (“**Customers**”), to which we provide the Software.

For you to access and use the Software, and to fulfil your obligations towards your employer and its patients, your employer must create an individual user account (“**User Account**”).

Qbtech is the controller and thereby responsible for the processing of the Personal Data in connection with the registration of your User Account and your use of the Software, carried out by us or on our behalf.

Throughout this Privacy Notice the term “**processing**” is used to cover all activities involving your Personal Data, including e.g. collecting, handling, storing, sharing, accessing, using, transferring, and disposing of your Personal Data. “**Personal Data**” is defined as any information relating to an identified or identifiable natural person.

#### 2 FROM WHERE DO WE COLLECT PERSONAL DATA?

Qbtech processes Personal Data provided by your employer necessary to create your User Account (i.e. name and email-address). We may also process Personal Data relating to your access and use of the Software through logging or by way of cookies. You can find more information on our use of cookies in our cookie-policy here: <https://www.qbcheck.com/public-info/cookie-and-tracking-technologies>.

#### 3 FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

##### 3.1 Managing user accounts

Qbtech processes your Personal Data to manage and administer the User Accounts registered by our Customers (i.e. clinic, healthcare providers, or schools) to provide you with access to the Software. Moreover, we process your Personal Data to fulfil our obligations towards our Customers ensuring that their personnel have access to the Software.

| Categories of Personal Data  | Legal basis   |
|--|---|
| <ul style="list-style-type: none"> <li>Name</li> <li>Contact information (i.e. email-address)</li> </ul> | <i>Legitimate interest.</i> The processing is necessary to manage and administer the User Accounts accessing the Software, as we have a legitimate interest to fulfil our obligations towards our Customers by providing the Software, and that our Customers have a legitimate interest to |

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|--|--|
|  | fulfil their obligations towards their patients. |
|--|--|

### 3.2 Management protection of our IT systems

Qbtech processes your Personal Data to the extent necessary for us to protect our IT systems (including the Software) through logging, troubleshooting, backup, change and problem management in IT systems and in connection with potential IT incidents. We also process your Personal Data to ensure that no unauthorised individuals are given access to the Software.

| Categories of Personal Data  | Legal basis  |
|--|--|
| <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (i.e. email-address)</li> <li>• Location from where the Software has been accessed (i.e. country and city)</li> <li>• Access and activity logs</li> </ul> | <p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting the Software and related IT systems.</p> |

### 3.3 Exercise, establish and defend legal claims

We may process your Personal Data for the purpose of establishing, exercising, and defending legal claims (for example in connection with a dispute of legal process).

| Categories of Personal Data  | Legal basis   |
|--|---|
| <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (i.e. email-address)</li> <li>• Location from where the Software has been accessed (i.e. country and city)</li> <li>• Access and activity logs</li> </ul> | <p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to establish, exercise, or defend legal claims, for example in connection with a dispute or legal process.</p> |

### 3.4 Fulfil legal obligations

Qbtech will process your Personal Data for the purposes of fulfilling legal obligations within the areas of, e.g. accounting, taxation, and requirements under the applicable data protection laws.

| Categories of Personal Data  | Legal basis   |
|--|---|
| <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (i.e. email-address)</li> <li>• Location from where the Software has been accessed (i.e. country and city)</li> <li>• Access and activity logs</li> </ul> | <p><i>Legal obligation.</i> The processing is necessary to fulfil Qbtech’s legal obligations.</p> |

**4 WHEN IS YOUR PERSONAL INFORMATION ERASED?**

The Personal Data processed under this Privacy Notice are retained as long as our legitimate interest for the processing of your Personal Data persists, generally for the term of the agreement between Qbtech and our Customers. Thereafter, your Personal Data are erased or anonymised so that it can no longer be linked to you.

Your Personal Data may be processed for a longer period of time (i) if we have a purpose for retaining the data (e.g. the processing of aggregated data in order to generally improve our services), (ii) if retention is required by applicable legislation (e.g. accounting information may need to be retained for 7 years in addition to the current calendar year) or (iii) if processing is required for the establishment, exercise or defence of legal claims. In such case, the applicable data will be retained for the required time period.

**5 TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?**

**5.1 Data processors acting on behalf of Qbtech**

Your personal data may be shared with our IT providers (i.e. companies providing IT services, forming the Software) for the purpose of providing the Software. Our IT suppliers who processes personal data on our behalf, so-called data processors, must always sign an agreement with us so that we ensure a high level of protection of your personal data with them as well. Specific safeguards are implemented regarding IT providers outside EU/EEA, such as agreements including the standard contractual clauses for data transfer adopted by the EU Commission and which are available on the EU Commission’s website.

**5.2 Other recipients**

| Recipients   | Purposes  | Legal basis   |
|--|---|---|
| <ul style="list-style-type: none"> <li>• Courts and arbitration tribunals</li> <li>• Public authorities</li> <li>• External advisers</li> <li>• Insurance companies</li> <li>• Counterparties</li> </ul> | <p>Establish, exercise, or defend legal claims.</p> | <p>To fulfil our <i>legitimate interest</i> to manage and defend legal claims, e.g. in relation to a dispute.</p> |

|                        |  |   |
|------------------------|--|---|
| Your employer          | Providing the Software to our Customers and ensuring access to authorised individuals/personnel. | To fulfil our <i>legitimate interest</i> to provide the Software to our Customers, and our Customers' legitimate interest to fulfil their obligations towards their patients. |
| Qbtech group companies | Enable day-to-day business management.   | To fulfil our <i>legitimate interest</i> in managing our day-to-day business activities and operations.   |

## 6 YOUR RIGHTS IN CONNECTION WITH OUR PROCESSING

Pursuant to applicable data protection legislation, you have the following rights in connection with our processing of your Personal Data:

- Right of access, i.e. a right to obtain information about what Personal Data we process about you and a copy of the Personal Data undergoing processing
- Right to rectification, i.e. a right to have incorrect data corrected
- Right to erasure, i.e. a right to have your Personal Data deleted
- Right to restriction of processing, i.e. a right to request that our processing is restricted, e.g. if you contest the accuracy of the Personal Data we are processing
- Right to data portability, i.e. a right to request that your Personal Data is being transferred from us to another company
- Right to object to our processing of your Personal Data
- Right to withdraw your consent, a withdrawal will however not affect the lawfulness of processing based on your consent before its withdrawal

You also have the right to lodge a complaint with a supervisory authority if you consider that our processing does not comply with the applicable data protection legislation. You can find more information on how to lodge a complaint with the Swedish Authority for Privacy Protection (Sw: Integritetsskyddsmyndigheten, "IMY") here:

<https://www.imy.se/privatperson/utfora-arenden/lamna-ett-klagomal/>

Some of the rights above are only applicable in certain situations. In case you would like to exercise any of your rights, please contact us via the contact details below.

## 7 CONTACT INFORMATION

If you have any questions regarding the processing conducted by Qbtech, you are welcome to contact us at [privacy@qbtech.com](mailto:privacy@qbtech.com), the contact us form on the Site or write us at Qbtech AB, Cardellgatan 1, 114 36 Stockholm, Sweden.