

Privacy Policy

Last updated: December 08, 2021

This Privacy Policy describes our policy and procedures related with the collection, use and sharing of Your personal data when You use the BD4QoL service and tells You about Your privacy rights and how the law protects You.

We use Your personal data to provide and improve the Service we provide. By using the BD4QoL mobile application service, You agree to the collection and use of information in accordance with this Privacy Policy.

Scope and Definitions

Scope

The scope of this Privacy Policy is the R&D project named BD4QOL <https://www.bd4qol.eu/wps/portal/site/big-data-for-quality-of-life>, within which we are collecting personal data from Head and Neck Cancer (HNC) patients under the objective of performing a prospective clinical study. BD4QoL's objective is to improve HNC survivor's Quality of Life (QoL) in order to profile HNC survivors for personalized monitoring and support, i.e. generate QoL indicators. These will allow early detection of risks and prevent long-term effects of treatment while at the same time inform patients and caregivers for personalized interventions.

We maintain the security of the data in accordance with applicable law, and we will not make your personal data public.

You use this mobile application because you have satisfied the clinical trial eligibility criteria and have signed a consent form for allowing collection and processing of your personal data. You may revoke your consent at any time by writing to dpo@dotsoft.gr.

Please read the text below carefully for the full details of the Privacy Policy we follow.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our BD4QoL Service.

- **Application** means the software program provided by the BD4QoL project's consortium downloaded by You on any electronic device, named BD4QoL. The project uses two types of applications named as follows: a) the "main BD4QoL mobile app" and b) the "foreground BD4QoL app".
- **BD4QoL project's consortium** (referred to as either "the consortium", or "We", "Us" or "Our" in this Agreement) refers to the partners that listed on the [Partners page](#).
- **Country** refers to: Greece
- **Device** means any device that can access the Service, that is a smartphone or a cellular tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the two mobile applications, the main and the foreground mobile app.
- **Service Provider** means any natural person or legal entity that processes the data on behalf of the BD4QoL project's consortium. It refers to organisations, or clinics, or companies that are part of the BD4QoL consortium, or individuals employed by the BD4QoL project's consortium members in order to facilitate the Service, provide the Service on behalf of the BD4QoL project's consortium, perform services related to the Service or to assist the BD4QoL project's consortium in monitoring and analysing how the Service is used.
- **App Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service functionalities themselves (for example, collection of daily number of steps done by an individual).
- **You** means the individual accessing or using the Service after successfully completing the enrollment procedure by the clinical institution that has asked You to participate in the clinical study and signing the corresponding consent form.
- **The clinical study** refers to the study within which You participate as part of the scope and objectives of the BD4QoL project.
- **The study app** refers to the mobile application(s) used to enable the clinical study to meet its purpose. It is the BD4QoL mobile app for which this Privacy Policy is shared with You.

Objective of the study app

The study app:

- collects data from Your mobile phone
- detects major deviations in the Your usual behavior (e.g., a reduction in physical activity or in sleeping)
- alerts You if the above occurs
- sends You recommendations from the so called “Bidi chatbot” in case a significant change in your usual behavior has occurred (e.g. Guidelines how to improve Your physical activity)
- allows You to “chat” trough text conversations with the “Bidi” chatbot whenever You feel like doing so
- sends You positive messages if a substantial improvement in Your behavior is detected
- will not disturb You if no major changes in Your usual behavioral patterns are monitored
- will send automated alerts to the Head and Neck team at Your hospital when major behavior changes are suspected to be relevant to health-related issues.

You may choose to stop the use of the App at any time. The app has a button by clicking on which you can either suspend for a time period data collection or opt-out from data collection. In this case You will decide whether your data will be used for the study or will need to be erased.

Collecting and Using Your Personal Data

Types of Data Collected

App Usage Data

Usage Data is collected automatically when using the BD4QoL Service.

Usage Data may include information such as the mobile app menus and screens that You visit, the time and date of Your visits, the time spent on those screens and other similar usage analytics data.

When You access the BD4QoL apps (or Service) through a mobile device, We may collect certain information automatically, including, but not limited to, the type (brand and model) of the mobile device You use, Your mobile operating system.

Information Collected while Using the mobile app

While using Our Application, in order to provide features of Our Application, We will collect, with Your prior permission:

- **Information regarding Your location**

We collect this information and store it to the BD4QoL project's consortium servers. This information is needed in order to understand, using reverse geolocation services, the places (and their category, ex. Restaurant, museum, church, shopping mall, etc.) You visit. These places may be for example restaurants, museums, health related places, etc. You can limit your permissions about the types of places You visit from the mobile app itself.

- **Information regarding Your activity**

We collect this information on a daily basis and store it at the project's servers. This information is used by Your hospital team to understand remotely Your daily physical activity behavior, i.e. whether you have been walking, or running, or cycling. Our application is accessing Your daily activities through the Google Activity Transition API.

We collect this information from You every 1 minute.

- **Information regarding Your steps**

Our application is accessing Your daily step count via the REST API provided by Google ([More information](#)).

We use this information to provide features of Our Service that include:

- Provide a daily/weekly/monthly/annual overview of Your daily steps count
- Give You the ability to set and accomplish *goals* related to Your daily step count
- Award you trophies and medals related to your physical activity performance.

This information is uploaded to the project's servers and is presented at Your device.

The information collected gathers steps done from You every 1 hour and then accumulates these for a full 24-hour Day.

We do not share any information with third parties or for any other purpose. Your data are pseudonymized and only your clinician can access your reports.

- **Other Personal Information from sensors and phone**

Our application is accessing Your smartphone's sensors and operating system to collect information about the following:

- Accelerometer (x, y, z measurements) every 1 minute
- Ambient Light where the smartphone is located, every 1 minute
- Screen Status (On or OFF) every 1 minute
- Wi-Fi connection (if any), every 1 minute (for example, the name of the Wi-Fi connected)
- Daily number of incoming and outgoing calls (no information about the Callers' Ids is neither detected nor stored)
- Daily number of incoming and outgoing SMS's (no information about the Senders' or Recipients' is neither detected nor stored)
- Total daily use of the phone's mobile applications (in seconds/minutes)
- Daily total time spent (in seconds / minutes) in certain social media applications: WhatsApp, Facebook, Messenger, Telegram, Viber, Instagram, and Zoom. However, You can limit Your permissions and opt-out for these data Not to be collected.

- **Personal dialogs with BiDi chatbot**

Our application is operating "Bidi", an interactive messaging tool feature that enables You to:

- Share something that is troubling You
- Report a health-related issue or any other issue
- Seek useful information.

The content of these dialogs is used for analysis and research purposes in the scope of this Study by IBM Ireland Limited as well as other Consortium members. At no point while using the chatbot "Bidi" within this Application will You be requested to share any personally identified information, such as Your name, e-mail address, date of birth, etc. We specifically request that You do not provide any such information at any time in the text boxes or while interacting with the chatbot feature "Bidi". You can find more specific information on IBM's Data Privacy Policy here: <https://www.ibm.com/privacy/ie/en/>

IMPORTANT: the chatbot is NOT a human. The tips and advice provided to you have been approved by your physicians according to clinical guidelines. No medications or medical interventions are suggested nor recommended by the chatbot tips.

How We collect Your Personal Data

The BD4QoL App will be installed on Your personal mobile phone. You must keep the App and Your mobile phone activated so that the app can collect personal data.

The data collection process is activated once You enroll to the study and then continue without any other action from your side (unobtrusively) unless You decide to discontinue either temporarily or definitively the collection of your data.

Use of Your Personal Data

We collect Your personal data to allow Your oncologists to monitor Your Quality of Life, early intercept possible health conditions that might need You to consult a physician and support You in Your daily living issues by offering advice and simple tips that might improve Your wellness and quality of life.

The BD4QoL study is looking to investigate whether a smartphone-based electronic tool (an App) is able to reduce or to predict a reduction in the quality of life of people treated for head and neck cancer. The study will also find out if the app can provide support to address quality of life issues.

People treated for head and neck cancer often have a reduction in their quality of life; this can be due to the side effects of treatment with problems such as dry mouth, hearing loss, etc. At the moment We do not have a way to predict who will suffer from the side effects of treatment. The only way to find out if someone has poor long-term quality of life is to administer repeated questionnaires at follow-up clinics. Smartphones can collect a lot of data that could detect quality of life deterioration by looking at changes in daily life activities. They can record when people are less active (for example reduced step count) or when people have less social activity (for example fewer phone calls, messages, less time on social media). An automated 'chatbot' could help people by enabling them to ask health related questions.

If the study is successful, it could mean that people with head and neck cancer would receive immediate support and advice on how to manage problems occurring after treatment through an app on their phone. It is hoped that this would reduce the impact on their quality of life. The head and neck cancer team would have more precise and continuous monitoring of their patients' health and quality of life.

Who will have access to Your data

A summary (by day, week, month) and the supporting data will be available to You and clinical investigators (e.g., physicians, nurses), through a visual representation (dashboard) available on the Application. The authorized clinical investigators will have

access to these data through a web tool for. The data collected by the mobile App will not be available to the technology manufacturer and will be transferred in almost-real-time (real-time when possible, i.e., as soon as data transfer is available) to the central BD4QoL repository infrastructure located in Spain (as long as there is Internet connection).

Only the BD4QoL study Team at the recruiting hospitals and the Consortium team members will be able to process and analyze Your data. This analysis will be done in a secured and pseudonymized manner to the team members.

Retention of Your Personal Data

The BD4QoL project's consortium will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Consortium members will also retain App Usage Data for internal analysis purposes. App Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the BD4QoL project's consortium members' operating offices and in any other places where the parties involved in the processing are located. The main data repository and infrastructure is located in Spain. Therefore, your information may be transferred to — and maintained on — computers located outside of Your state (ex. outside Italy or UK, but still within the EU), province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

The BD4QoL project's consortium will take all technical and operational Measures reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and that no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Opt-out / Withdraw from the study

You may choose to stop the use of the App at any time. The App has a button by clicking on which you can either suspend for a time period data collection or opt-out from data collection for good.

In this case We will contact You to understand whether You approve (or not) the use of Your historical data already collected. If You approve, We will keep the data for the use of the clinical study and will de-activate the data collection process. You will still have access to Your mobile App. If you do not approve, then all Historical data will be erased, Your account will be de-activated and we will notify You about doing so.

Security of Your Personal Data

The security of Your Personal Data is important to Us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

Personal data collected is “pseudo-anonymized” prior to any processing, that is, an identifier will be assigned so that Your name and surname will always remain anonymous. Likewise, other personal information such as, e.g. home address, which may reveal your identity will be treated securely and only used for purposes of understanding your physical activity behavior (for example daily walking distance from home).

Personal Data will be analysed by Consortium members within the EU. Data Transfers to the UK will take place pursuant to the 28 June 2021, EU Commission’s adequacy decisions for the United Kingdom which have determined that the UK offers an adequate level of data protection (GDPR article 45).

Children's Privacy

Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If We become aware that We have collected Personal Data from anyone under the age of 18 without verification of parental consent, We take steps to remove that information from Our servers.

Links to Other Websites

Our Service may contain links to other 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. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: dpo@dotsoft.gr