

PRIVACY POLICY

Last updated January 18, 2019

Thank you for choosing to be part of our **BrainE** community at NEATLabs, UC San Diego. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at braine@ucsd.edu.

When you visit our mobile **BrainE** application, you trust us with your information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our App.

This privacy policy applies to all information collected through our mobile application. Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

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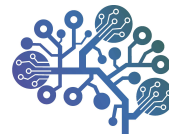
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1. WHAT INFORMATION DO WE COLLECT?

In Short: We collect personal information that you provide to us i.e. your name, date of birth, and contact information (email/phone).

We collect personal information that you voluntarily provide to us when registering on the BrainE App after you have undergone the informed consent process for our study.

2. HOW DO WE USE YOUR INFORMATION?



In Short: We process your information solely based on your consent.

We use the information we receive to facilitate account creation and logon process.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We make every reasonable effort to keep your records confidential. This also means we do not share information you give on the BrainE app.

We may process data based on the following legal basis:

Consent: We process your BrainE data in a de-identified format. This means that your app engagement, performance and progress data is processed linked to a non-identifying alphanumeric study ID # and your personal information is not linked to this data.

4. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

No purpose in this policy will require us keeping your personal information for longer than 3 years past the termination of the research project that you have consented to.

When we have no ongoing legitimate need to process your personal information, we will delete it. Please note that we securely store your personal information at all times and isolate it from any data processing. The personal information you provide is solely used for ongoing research study contact.

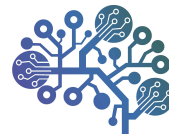
5. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our App is at your own risk. You should only access the services within a secure environment.

6. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time.



Account Information: If you would at any time like to review or change the information in your account or terminate your account, you can contact us using the contact information provided.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

7. CONTROLS FOR DO-NOT-TRACK FEATURES

The BrainE app does not track any of your activities outside the app environment.

8. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

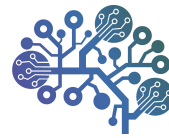
Specifically, California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits app users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes. This is not applicable as we do not share any personal information collected on the BrainE app with third parties.

If you are under 18 years of age, reside in California, you have the right to request removal of unwanted data that you publicly post on an app that has your registered account. This is not applicable as you cannot publicly post any information on the BrainE app.

9. DO WE MAKE UPDATES TO THIS POLICY?

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.



10. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may contact us by email at braine@ucsd.edu or by post to:

NEATLabs, UC San Diego
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