

# **T1.4 / PRIVACY AND DATA PROTECTION POLICY OF THE miPROLEPSIS JOINT LANDMARKER**

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## 1 Introduction

The miPROLEPSIS Joint Landmarker is part of the iPROLEPSIS application and its purpose is to assess the hand/body movements of patients through the collection of skeletal frames. With the use of this module, the camera of the end user's smartphone will be activated, allowing the user to perform the movements in front of the camera, while the miPROLEPSIS Joint Landmarker processes the video frames to compute skeletal data. Permission of access shall be granted by the end user prior to the use of the module. The collected files will not be stored by this module but they will be directly transferred, through the use of encryption, to the iPROLEPSIS application and will be processed according to the procedure described in the [privacy policy](#) of the iPROLEPSIS application.

In this policy, the processing of personal data is described, with reference to the personal data that will be collected and the overall procedure that is being followed during the use of this module from the end user. The current policy is supplementary to the iPROLEPSIS application privacy policy and serves as an addition to the terms of the main policy in the cases mentioned below, that specifically refer to the operation of the miPROLEPSIS Joint Landmarker component.

## 2 Personal data collection

**2.1** Personal data includes any information in paper or digital form that may lead either directly or in combination with other information (indirectly) to the unique identification of a natural person.

**2.2** For the purpose of provision of the services by the app during the study, the body movements of the patients will be collected, in the form of skeletal frames. No images, frames or any other format of files containing information regarding the body physiology of the patients will be collected and processed in any way through this module.

**2.3** The personal data collected will be stored in a pseudonymized form according to the procedure foreseen in the privacy policy of the iPROLEPSIS application. No identifiers related to the personal information of the patients will be requested during the use of this component and such information will be stored only by the clinic that is conducting the study that you participate in and will not be transferred, disclosed or in any way become available to any other project partner or third party.

## 3 Processing operations on personal data

The envisaged processing operations on the aforementioned personal data are the collection of the personal data directly from the end users through the use of the miPROLEPSIS Joint Landmarker component and direct transfer to the iPROLEPSIS data management infrastructure. No images, videos or in general personal data will be stored by this component but rather directly transferred to the iPROLEPSIS data management infrastructure, according to the privacy policy of the iPROLEPSIS application.

## 4 Lawful Processing

**4.1** The legal basis for processing of the aforementioned personal data for the project related purposes through the use of the app is informed consent, according to articles 6 par. 1a', 9 par 2a' and 7 of the GDPR. The end users are provided with a form, with which they will provide their consent to the processing operations on their personal data, as they are described in sections 2 and 3 of the current policy. Additionally, since the processing of the end users' personal data is based on their previously given explicit informed consent, they have the right to withdraw from it at any time by making a relevant request to our authorized legal partner of the project via an email at [legalint@diadikasia.gr](mailto:legalint@diadikasia.gr)

**4.2** During the course of the consent provision process, the end users will be thoroughly informed regarding the processing operations, the personal data that will be processed, the purpose of the personal data processing operations, the data controllers and any potential data processors, the period of storage of the personal data and their data protection related rights and the way they could exercise them.

## **5 Security**

The secure processing of the end users' personal data is of utmost importance to us. Our project partners take all appropriate organizational and technical measures to ensure the confidentiality, integrity, and availability of the personal data collected under this Policy. The transfer of the aforementioned personal data to the iPROLEPSIS data management infrastructure will be done through the use of end to end encryption.

## **6 Contact**

If you have any questions or comments regarding this privacy and data protection policy of the miPROLEPSIS Joint Landmarker component, the measures taken by our project partners to protect your personal data or you wish to exercise any of your rights as a data subject, please contact us at the designated email address or the mean of communication provided to you during the consent provision process.

Additionally, the end users could proceed to the aforementioned actions by contacting the authorized legal partner of the project, Diadikasia Business Consulting Symvouloi Epicheiriseon AE, via the email [legalint@diadikasia.gr](mailto:legalint@diadikasia.gr).

## **7 Validity of the Privacy and Personal Data Protection Policy**

This Policy was published by the Project partners on 26/06/2024 and is subject to periodic improvement and revision. For this purpose, we encourage the end users to periodically review this Policy to stay informed about how we manage the end users' personal data.