

Last updated: 28 June 2020

This privacy policy refers to icompanion v1.x.x

1. Introduction

Icometrix NV (with registered office at Kolonel Begaultlaan 1b/12B, 3012 Leuven, Belgium and company number 0833.377.379) will process your Personal Data gathered through the icompanion platform (the “**Platform**”).

icometrix finds the protection of your privacy very important. icometrix processes your Personal Data in accordance with the GDPR. icometrix wishes to inform you on how your Personal Data will be processed by icometrix and how you can control the processing of your Personal Data. You can find more information about your Personal Data and your privacy [here](#).

In this policy the term ‘Personal Data’ will be used often. Personal Data is any information that can identify you. Examples of such information are your name, your email address, MRI scans, etc.

2. How are your Personal Data used and how can you contact us?

icometrix processes the Personal Data it collected or that you provided through the Platform.

Processing of your Personal Data means any sort of operation performed with respect to your Personal Data. Examples of processing activities are: using, accessing, storing, deleting, viewing, etc. Personal Data.

In some cases icometrix will have the role of a data controller, which means that icometrix decides on how and why your Personal Data are collected and used. In other cases, icometrix will have the role of a data processor, which means that icometrix processes your Personal Data on behalf of another party, i.e. in which case that party decides on how and why your Personal Data are collected and used. In such case, Personal Data will be transferred to third parties in accordance with section 6 of this Privacy Policy.

If you have any questions about how your Personal Data are processed, you can contact the data protection officer of icometrix at dpo@icometrix.com.

3. Which of your Personal Data are collected by icometrix?

icometrix processes different types of Personal Data; this depends on how you use the Platform. icometrix might process these Personal Data when you use the Platform:

Contact information	Personal Data such as name, email address, login and password, etc.
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Health and Medical information	Personal Data concerning your health and medical condition such as treating doctor and medical center; information in respect of the diagnosis, self-reported results, symptoms, use of medication, scans, etc.
History and logs	Personal Data such as browser type, OS information, etc.
Technical information	Personal Data such as data from computers, telephones or other devices on which you use the Platform, your IP address, browser type, etc.
Cookies	For more information, reference is made to our Cookie Policy.

If you provide Personal Data relating to another person through the Platform or with a view to use the Platform, you guarantee that you have informed that other person and that you have received its explicit consent to communicate that person's Personal Data.

4. Why does icometrix process your Personal Data?

icometrix processes your Personal Data for a certain purpose; this purpose justifies the processing of your Personal Data by icometrix. Different purposes may apply depending on the type of Personal Data icometrix processes. Below you will find an overview of the purposes for which your Personal Data are processed by icometrix:

Contact information	Purpose	Your contact information is used for authentication and authorization purposes (i.e. your identification and access as a user), communication purposes, to give a (potentially anonymous) testimony or to answer support questions, for the operation of the Platform, etc.
	Lawfulness of Processing	This processing is justified by your consent, the legitimate interest of icometrix or the performance of the agreement between icometrix and you.
Health and Medical information	Purpose	Your health and medical information is used for academic, clinical, educational, informational, medical, or other research (including any product development for such purposes) and is also used to improve the operation of the Platform and the provision of other products and services.
	Lawfulness of Processing	This processing is justified by your consent.
History and logs	Purpose	History and logs are used to provide service support and to improve the operation of the Platform and other icometrix' products and services, etc.
	Lawfulness of Processing	This processing is justified by the legitimate interest of icometrix.

Technical information	Purpose	Technical information relating to you is used to provide service support, and to improve the operation of the Platform and other icometrix products and services, etc.
	Lawfulness of Processing	This processing is justified by the legitimate interest of icometrix.

Legitimate interest means that the interest of icometrix prevails over your interest, because the processing of your Personal Data shall not create a risk to your fundamental rights and freedoms.

The processing of your Personal Data might be necessary for the performance of the agreement between you and icometrix. icometrix will not be able to comply with certain of its obligations if you refuse to provide or the processing of your Personal Data. For example, the processing of your Personal Data might be necessary to provide you access to the Platform or respond to your questions.

When you provide consent, this consent is always free, and you have the right to withdraw this consent at any time. When you withdraw your consent, icometrix will no longer process your Personal Data, unless that processing is based on legitimate interest or the performance of the agreement.

The purposes that are listed here may not be complete and icometrix may process your Personal Data for another legitimate reason. When this is the case icometrix will notify you as soon as possible of this new purpose.

5. When do you communicate your Personal Data?

You communicate Personal Data to icometrix when:

- you register your account on the Platform;
- you add information on the Platform;
- you visit the Platform;
- you load the Platform in your browser;
- when you navigate to a new page of the Platform;
- errors or bugs occur;
- ...

6. Are your Personal Data processed by other parties?

icometrix will only share your Personal Data in a minimal way and your Personal Data will be anonymized and encrypted (to the maximum extent possible) before it is transferred to a third party in order to provide an appropriate level of confidentiality.

Your Personal Data may be shared within icometrix and with third parties to perform academic, clinical, educational, informational, medical and other research purposes (including any product development for such purposes) and for the operation of the Platform and the provision of other products and services. You therefore provide your express consent to share your Personal Data as described in this Policy.

If icometrix provides your Personal Data to third parties it will ensure that those third parties respect the principles set out in this Policy.

Processors and Subprocessors of icometrix always act under the responsibility of icometrix. If icometrix contracts Processors or Subprocessors, this will always be done in accordance with a Data Processing Agreement that meets the requirements of the GDPR and that protects your Personal Data as well as possible.

Upon request, icometrix shall provide an overview of third parties to whom your Personal Data have been transferred.

If you are directed to another application, platform or website through the Platform, other terms and conditions and other privacy and cookie policies may apply. You should take into account and read these terms and conditions and privacy and cookie policies of the other applications, platforms and websites you visit.

7. Are your Personal Data used for profiling?

icometrix may use your Personal Data for profiling. Profiling means that your Personal Data might be processed automatically by icometrix, without human interference. You must know that this profiling does not produce legal effects concerning you and does not significantly affect you.

icometrix might use your contact information for profiling to improve the knowledge in respect of multiple sclerosis for the general interest. If you would like to know more about the underlying logic of this profiling, you can request more information on the mathematical or statistical procedures of this logic by addressing a written request to icometrix at dpo@icometrix.com.

8. Are your Personal Data used for direct marketing?

icometrix will not use your Personal Data for direct marketing purposes.

9. Are your Personal Data transferred outside the European Economic Area?

icometrix may transfer your Personal Data to countries outside the European Economic Area. In this case, icometrix shall use appropriate safeguards to ensure the protection of your Personal Data and your fundamental rights and freedoms.

10. How long will your Personal Data be stored?

icometrix stores your Personal Data during the time periods set out below:

Contact information	Your contact information is stored (i) as long as the consent you provided is valid, or longer; (ii) if and as long as icometrix has a legitimate interest or (iii) as long as needed for the performance of the agreement.
Health and Medical information	Your health and medical information is stored as long as the consent you provided is valid.
History and logs	The history and logs are stored as long as icometrix has a legitimate interest.
Technical information	The technical information relating to you is stored for 26 months or longer if and as long as icometrix has a legitimate interest.

icometrix keeps on storing your Personal Data even if you temporarily stop using the Platform until you permanently delete your account by contacting icometrix via support@icompanion.ms.

Even when your account is deleted, icometrix might still process and disclose your Personal Data to third parties after your Personal Data has been anonymized or encrypted. Your Personal Data might however still be used by icometrix when the terms and conditions determine this. You can consult the terms and conditions of the Platform [here](#).

11. How are your Personal Data protected and kept safe by icometrix?

icometrix has developed appropriate measures to protect your Personal Data against loss, misuse, or unauthorized alteration in accordance with applicable Belgian and European regulations. A team of technicians works at icometrix to ensure the safety of your Personal Data by using automated systems, and advanced technologies. If you would like to know more about the appropriate security measures and safeguards, you can request more information by addressing a written request to icometrix dpo@icometrix.com.

Even when icometrix uses its best efforts to keep your Personal Data safe, you should know that there are always risks associated with sending Personal Data over the internet and that the security and protection of your Personal Data can never be fully guaranteed.

12. What rights do you have?

You have the following rights under the applicable laws and regulations:

- to receive confirmation that icometrix processes your Personal Data and access to these Personal Data;
- to demand correction of any inaccurate or incomplete Personal Data;
- to have your Personal Data deleted by icometrix;
- that icometrix provides you with your Personal Data processed by icometrix so that you can transfer them to another party;
- to obtain a limitation of the processing of your Personal Data from icometrix;
- to receive your Personal Data in a structured, common and machine-readable format; and
- to prevent the processing of your Personal Data and the use of your Personal Data for direct marketing purposes.

You can exercise your rights yourself on your account on the Platform or you may exercise these rights by contacting the data protection officer:

You can file a complaint with the competent supervisory authority if the processing of your Personal Data violates the applicable regulations. In Belgium the competent authority is the Data Protection Authority (“Gegevensbeschermingsautoriteit”) <https://www.dataprotectionauthority.be>.

13. Amendments to this Policy

icometrix may amend this policy, when the processing by icometrix of your Personal Data changes. The date of the most recent version is shown at the top of the policy.

14. Consent for disclosure

icometrix may disclose your Personal Data if this is required by law, or if icometrix determines in good faith that such disclosure is required in order:

- to comply with any pending judicial inquiry, judicial order or litigation;

- to respond to claims against icometrix regarding Personal Data that violate any rights of third parties;
- to safeguard the rights, property and safety of icometrix, its employees, users, and the general public.

icometrix may disclose your Personal Data to competent police or judicial authorities or other official government authorities if icometrix deems this useful or necessary, in its sole discretion, for the investigation of fraud, intellectual property infringement or any other harmful activity, or if icometrix reasonably suspects that such activity may expose icometrix or you to any liability.

15. Liability

If icometrix has legitimately transmitted your Personal Data to a third party (not being a processor or subprocessor), icometrix shall not be liable for any unlawful processing or unlawful use by that third party.

Under no circumstances does icometrix accept responsibility for any direct or indirect damage resulting from faulty or unlawful use of the Personal Data by a third party (not being a processor or subprocessor).

icometrix is also not liable when third parties process or use your Personal Data illegitimately and icometrix has taken appropriate technical and organizational measures to go against such illegitimate processing or use.

icometrix is in any case only liable for the damage caused by processing of Personal Data if it did not comply with its specific obligations under the GDPR. icometrix shall in no event be liable for any special, incidental, indirect or consequential losses or damages.

16. Applicable law

This policy shall be governed, interpreted, and implemented in accordance with Belgian law, which applies exclusively in the event of any dispute.