

## **Privacy Statement Memory Lane – Roxelane Care B.V.**

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### **1. Introduction**

Your privacy is important to us. This Privacy Statement explains how we handle your personal data.

We will only use your personal data for the purposes stated in this Privacy Statement and not for other purposes, unless further processing of the personal data is compatible with the purposes for which these data were originally processed.

### **2. What personal data we collect**

We collect personal data (personal data) that you provide to us via one of the following methods. Through a carer via our website [www.mymemorylane.com](http://www.mymemorylane.com), via our Memory Lane App, via Memory Lane or when you contact us in any other way. Personal data is information that can be used to identify you.

Data we collect from you are:

- Name
- Date of Birth
- Gender
- Address
- Email address
- Login details
- Phone number(s)
- Payment details (bank account number, card number)
- IP address
- GPS coordinates
- Photos
- Health data

### **3. Why we collect your personal data: purposes and bases.**

We may process your personal data for the following purposes with the legal bases listed below.

We will not use your personal data for other purposes unless further processing of the personal data is compatible with the purposes for which it was originally processed.

We will not use your personal data to make a decision based solely on automated processing, including profiling.

We use some data for our own legitimate interests, such as improving our services. You have the right to object to these processing operations. If you wish to object, please contact us. We will cease processing your personal data in that case, unless there are compelling legitimate reasons which make our interest in the processing greater than your interest in ceasing the processing. It is possible that when you request us to stop processing, you will no longer be able to make optimal use of our services.

### **Customer service and helpdesk**

If you contact us about a question or problem, we may process personal data about you. The legal basis for this is the execution of the agreement with you. If we do not yet have an agreement with you, but the contact relates precisely to the (possible) conclusion of an agreement, this also falls under that legal basis (pre-contractual phase).

### **Communication from Memory Lane**

We may send newsletters and messages to you and in that context we may process your personal data. This may be because you have signed up for them, in which case the legal basis is consent. We may also send you newsletters and messages containing relevant information about our services and services, in which case the legal basis is performance of the agreement with you.

### **Customer satisfaction surveys**

We may conduct customer satisfaction surveys in various ways in order to optimize our services. The legal basis for processing personal data related to this is our legitimate interest.

### **Use of the Memory Lane and/or Memory Lane App**

If you make use of Memory Lane and/or the Memory Lane App, we process those personal data which are necessary to enable the use of Memory Lane and/or the Memory Lane App. We then do so on the legal basis performance of the agreement with you.

The data you enter during use, such as your profile data and the photos you place in the photo album, are processed by us. This data is stored on a server/cloud, to which we have access as the administrator. We also process data to, for example, adjust the rotation or size and to analyze (by means of software) and tag, so that the photos are grouped correctly.

### **IP address and location data**

We collect your IP address and GPS coordinates for security reasons. This data enables us to detect security breaches, for example, repeated attempts to log in with an unknown (foreign) IP address. We process the location data in order to locate a possibly lost Memory Lane. The basis for this processing is our legitimate interest, to be able to secure your data.

### **Health data**

A customized exercise program can be used on Memory Lane. To put together this personalized exercise program, we ask for a limited number of health data. For example, we ask if you have a fear of falling, dementia and if you have any joint problems. We ask these so that the exercise program can be tailored to your abilities and circumstances. You can also skip these questions, but this may result in reduced function. We therefore only process this data if you give us explicit consent. You can also withdraw this consent, in which case we will delete this health data.

### **Payments or refunds**

If we receive payments from you or have to make (refund) payments to you, we process your personal data for this purpose on the legal basis of executing the agreement with you. The payment process runs through our partner S.P. Abonneeservice B.V. (for more information and that party's privacy statement, see <http://www.spabonneeservice.nl/privacy.html>). We have entered into a processing agreement with this partner, in which we have made agreements on how your data should be handled.

#### **4. How long we keep your data**

We do not retain your personal data for longer than is necessary for the purpose for which we process the data.

In principle, if we no longer have a contract with you, we also delete the personal data we hold about you within six (6) months. We do not delete the personal data immediately because we may still need to be able to handle any service requests. Within that six-month period it is possible to renew the Memory Lane subscription without loss of data, thereafter this is no longer possible. Should you have signed up for our newsletter or message service, we will still keep that data until you indicate that you no longer wish to receive it.

Some personal data must be kept longer because we are required to do so by law (for example, data relating to payments). We keep these data for as long as the legal obligation continues.

#### **5. How we safeguard your information**

We ensure appropriate security of your personal data and we take appropriate technical and organizational measures to protect your personal data against unlawful processing or loss.

The security measures we have taken include, but are not limited to, the following measures:

- Our IT systems have been and are regularly updated and secured in accordance with market standards;
- Our app uses encrypted connections to the Microsoft Azure Cloud platform and an image server from TransIP. All information is stored in this cloud environment, so no personal data (with the exception of your login name) is stored locally on your device. For performance purposes, certain images may be temporarily stored in the Memory Lane local cache;
- Only authorized persons have access to your personal data;
- We conclude processing agreements with third parties who process your personal data on our behalf.

#### **6. Where your personal data are processed**

The processing of your personal data by Memory Lane itself takes place in the Netherlands. If we use third parties to process your personal data, they are generally located in the European Union, but possibly also outside of it.

Your personal data will not be processed in or transferred to other countries without appropriate safeguards to protect your data.

#### **7. Who has access to your data.**

We will not share your personal data with third parties except to the categories of third parties listed below or if you have given us your prior consent to share your data with a particular third party.

We may share your personal data with the following categories of third parties:

- Professional advisors such as lawyers and accountants
- Third parties to whom we outsource certain services, such as: IT systems or software vendors, IT service providers, document and information storage providers
- Third parties who provide support in connection with our services, such as accounts receivable management and collection services
- Service providers who assist us with analytics, such as SAS Analytics and Google Analytics

We reserve the right to share your personal data with (other) third parties when required by law or when necessary to protect the interests of you, us or third parties.

## **8. Changes to our policy.**

This Privacy Statement may be amended in the event of changes to our services or changes in privacy legislation. We will post any changes on our website. When changes apply to you, we will inform you personally, for example by sending you an e-mail.

## **9. How to exercise your rights**

You have a number of rights under privacy legislation (including the General Data Protection Regulation (AVG)). These rights are described in Articles 12 - 23 of the AVG and in related legislation. You have at least the following rights in relation to your personal data:

- Right to request access to your personal data;
- Right to request correction of your personal data if it is incorrect (rectification);
- Right to request deletion of your personal data;
- Right to request restriction of your personal data;
- If we have processed your personal data based on our legitimate interests: right to object to the (further) processing of your personal data (objection)
- If we have processed your personal data based on your consent or based on an agreement we have entered into with you: right to request transfer of the personal data (data portability)

If you wish to exercise one or more of these rights, please contact us.

## **10. Right to complain**

Do you disagree with a decision we make, such as when we decide not to delete your personal data? You can then use one or more of the following options:

- Contact us at [support@mymemorylane.com](mailto:support@mymemorylane.com): in which case we will try to reach a solution with you.
- File a complaint: you have the right to file a complaint with the Personal Data Authority: <https://www.autoriteitpersoonsgegevens.nl/>
- Request mediation: you can ask the Personal Data Authority to mediate between you and us: <https://www.autoriteitpersoonsgegevens.nl/>
- Litigate: you have the right to apply to the competent court to settle the dispute.

## **11. Contact**

The responsibility for processing the personal data referred to in this privacy statement lies with:

Roxelane Care B.V.  
Europalaan 400  
3526 KS Utrecht

e-mail: [support@mymemorylane.com](mailto:support@mymemorylane.com)

If you contact us with a question or request regarding your personal data, it is important that we are certain that the request or question was actually made or asked by or on behalf of you. Therefore, we ask that you send a copy of your proof of identity with the request or question. Otherwise we will not be able to process it. In order to protect your privacy, please do black out your passport photo, MRZ (machine readable zone, the strip of numbers on the ID document), document number and Citizen Service Number (BSN) in this copy. We will respond to your request or question as soon as possible.